

EXHIBIT 2

StratFS Receivership
Summary of Invoices
3rd Interim Fee Application

	P/E	Fees	Expenses
McNamara Smith LLP	8/31/2024	65,635.00	39.95
McNamara Smith LLP	9/30/2024	53,043.00	58.11
McNamara Smith LLP	10/31/2024	73,305.50	674.85
McNamara Smith LLP	11/30/2024	61,276.00	41.40
McNamara Smith LLP	12/31/2024	85,532.50	351.64
McNamara Smith LLP	1/31/2025	113,797.00	1,802.69



L A W Y E R S

August 31, 2024

Invoice Period: 08-01-2024 - 08-31-2024

RE: 2158.02 MS

StratFS Receivership

Time Details

Date	Professional	Description	Hours	Rate	Amount
08-01-2024	ADW	Review spreadsheet from A. Palazzo of VCorp re: overdue and upcoming Atlas and Timberline state renewals and relevant state fees; email to T. McNamara re: Atlas and Timberline renewals and state fees; email exchange with A. Palazzo re: VCorp's fees and process re: Atlas and Timberline state filings.	0.70	495.00	346.50
08-01-2024	KRG	Pull Blust Two Square invoices with C. Christo correspondence for T. McNamara re: Buffalo hearing.	0.20	110.00	22.00
08-01-2024	LDS	Review potential options for consumers and email NFCC General Counsel re: same.	0.30	595.00	178.50
08-01-2024	LDS	Review related materials and continue to prepare supporting material re: fee application.	0.70	595.00	416.50
08-01-2024	KRG	Continue review and indexing of documents found at NYC site (Box 9).	4.50	110.00	495.00
08-02-2024	KRG	Complete review and indexing of documents found at NYC site (Box 9).	2.20	110.00	242.00
08-02-2024	ADW	Review invoices re: StratFS receivership and segregate fees relating to motion for order to show cause re: contempt against J. Blust and Lit Def, motion for order to show cause re: contempt against Intervenor Law Firms, and Fidelis Support's motion challenging receiver's determination.	1.90	495.00	940.50
08-02-2024	ADW	Review and revise draft of 2nd fee application.	2.30	495.00	1,138.50
08-02-2024	ADW	Email to A. Barreto, client of an Intervenor Law Firm, providing general information and additional consumer resources.	0.30	495.00	148.50
08-05-2024	ADW	Confer briefly with K. Galvin re: identification of LLC's potentially holding receivership assets, preparation of summary of LLC's and information	0.20	495.00	99.00

Date	Professional	Description	Hours	Rate	Amount
		needed.			
08-05-2024	ADW	Review and analyze VCorp's invoices for acting as state filing agent for Atlas and Timberline, checking for duplicates and confirming total amounts; email to T. McNamara requesting authorization to pay invoices.	0.30	495.00	148.50
08-05-2024	ADW	Confer with K. Galvin re: CIBC due diligence issues relating to Ice litigation and StratFS's and Law Firms' advance fee structure.	0.20	495.00	99.00
08-05-2024	KRG	Prepare return shipping for StratFS employee laptop repair.	0.20	110.00	22.00
08-05-2024	KRG	Review StratFS preserved document index to generate LLC list; circulate index and LLC list to attorney team for further review.	1.20	110.00	132.00
08-05-2024	KRG	Review CIBC and CSG overlapping documents in Relativity, circulate findings to A. Wall and confer with A. Wall re: same.	1.50	110.00	165.00
08-06-2024	KRG	Review invoices to StratFS and make recommendations as to which invoices are pre-receivership and which are post-initial access; confer with L. Jones re: same.	0.30	110.00	33.00
08-06-2024	KRG	Edit StratFS preserved documents index.	0.30	110.00	33.00
08-06-2024	ADW	Continue reviewing invoices re: StratFS receivership and separate out fees relating to motion for order to show cause re: contempt against J. Blust and Lit Def, motion for order to show cause re: contempt against Intervenor Law Firms, and Fidelis Support's motion challenging receiver's determination; email to T. McNamara and L. Smith re: fees for Blust/Lit Def OSC Motion, Law Firms OSC Motion, and Fidelis Motion Challenging Receiver.	2.20	495.00	1,089.00
08-06-2024	ADW	Meet with K. Galvin to discuss and strategize potential clawback and other third-party claims, reviewing and assessing claims and evidence against potential targets.	0.50	495.00	247.50
08-06-2024	ADW	Review K. Galvin's memorandum re: Ice Legal's settlement with StratFS and post-settlement services to company.	0.20	495.00	99.00
08-06-2024	LDS	Review and revise fee application and circulate same; review filings made by Receiver during relevant time frame.	1.00	595.00	595.00
08-06-2024	KRG	Meet with A. Wall to discuss and strategize potential clawback and other third-party claims, reviewing and assessing claims and evidence against potential targets.	0.50	110.00	55.00

Date	Professional	Description	Hours	Rate	Amount
08-07-2024	KRG	Meetings with A. Wall to discuss findings re: Mandaree, LLC's related to StratFS, Lucky Marketing, several StratFS regulatory attorneys, and various LLC's that Defendants owned or invested in.	0.70	110.00	77.00
08-07-2024	LDS	Review potential for options for consumers; confer with counsel for NFCC and consider next steps to be taken for resolution of consumer debts.	1.20	595.00	714.00
08-07-2024	ADW	Meetings with K. Galvin to discuss findings re: Mandaree, Lucky Marketing, several StratFS regulatory attorneys, and various LLC's that Defendants owned or invested in.	0.70	495.00	346.50
08-07-2024	ADW	Review inquiry from office of the Kansas State Bank Commissioner, research Vervent's loan servicing licensing in Kansas; email to B. Reiss requesting list of active Versara loans to Kansas borrowers.	0.50	495.00	247.50
08-07-2024	ADW	Review and analyze opinion letters obtained by Defendants re: legality of face-to-face meeting under Telemarketing Sales Rule, as part of assessing potential third-party and asset clawback claims.	1.40	495.00	693.00
08-07-2024	ADW	Review spreadsheet of Kansas non-Vervent loans from B. Reiss; email to B. Reiss requesting similar spreadsheet for Vervent loans.	0.10	495.00	49.50
08-07-2024	KRG	Create keyword searches in Relativity for Lucky Marketing LLC and Mandaree Enterprises LLC related correspondence, review and identify hot documents re: same and preserve for further review.	4.60	110.00	506.00
08-07-2024	KRG	Create keyword searches in Relativity for StratFS correspondence with ProBank Austin, preserve relevant documents for further review.	1.40	110.00	154.00
08-08-2024	KRG	Create keyword searches in Relativity targeting correspondence between Global Holdings and Strategic and RAM LLC and Strategic re: third-party claims; review correspondence and preserve relevant documents.	2.30	110.00	253.00
08-08-2024	ADW	Meet with T. McNamara and K. Galvin to review and discuss potential third-party claims and defendants.	0.60	495.00	297.00
08-08-2024	ADW	Review documents re: Mandaree Enterprises; research re: preliminary considerations and procedure for potential claim against Mandaree Enterprises.	1.00	495.00	495.00
08-08-2024	KRG	Meet with T. McNamara and A. Wall to review and discuss potential third-party claims and defendants.	0.60	110.00	66.00

Date	Professional	Description	Hours	Rate	Amount
08-08-2024	ADW	Further discussions re: potential third-party claims and plan for next steps.	0.20	495.00	99.00
08-08-2024	KRG	Meet with A. Wall to de-brief and plan for next steps.	0.20	110.00	22.00
08-09-2024	ADW	Call with A. Lovin re: Vervent licensing and Versara loans in Kansas.	0.10	495.00	49.50
08-09-2024	KRG	Correspond with Office Furniture NYC re: potential decommission of NYC Office.	0.10	110.00	11.00
08-12-2024	KRG	Assemble insurance information packet with rates and enrollment forms for StratFS rehired employees.	0.60	110.00	66.00
08-12-2024	KRG	Correspond with H. Quatinetz re: list of email boxes preserved by Ankura.	0.10	110.00	11.00
08-12-2024	ADW	Review summons, complaint, and third-party complaint in North Carolina state court action re: Atlas Debt Relief; email to T. McNamara re: sending notice of receivership and stay to defense counsel.	0.80	495.00	396.00
08-12-2024	ADW	Email to J. O'Donnell re: North Carolina state court action and client's account information.	0.10	495.00	49.50
08-12-2024	ADW	Review email from B. Reiss re: Regus remote office invoices for Versara; email to L. Jones re: payments to Regus.	0.20	495.00	99.00
08-12-2024	ADW	Review documents re: Lucky Marketing, Mandaree, Ice Legal, and other StratFS-affiliated entities, and begin drafting memorandum re: potential third-party claims.	4.10	495.00	2,029.50
08-13-2024	ADW	Review spreadsheet from Vervent re: active loans to Kansas borrowers; email to Vervent representative re: Vervent's licensing status in Kansas.	0.20	495.00	99.00
08-13-2024	ADW	Continue reviewing documents re: Strategic's attorneys and financial advisors and other StratFS-affiliated entities, and drafting third-party claim memorandum; confer multiple times with K. Galvin re: Mandaree and Lucky Marketing documents and relationships with StratFS.	4.60	495.00	2,277.00
08-13-2024	ADW	Email exchange with L. Smith re: aiding-and-abetting liability.	0.80	495.00	396.00
08-13-2024	KRG	Meet with T. McNamara, B. Reiss and J. O'Donnell re: third-party claims.	1.20	110.00	132.00
08-13-2024	KRG	Review and edit call notes from third-party claims	0.40	110.00	44.00

Date	Professional	Description	Hours	Rate	Amount
		call with B. Reiss, J. O'Donnell, and T. McNamara, circulate same to team.			
08-13-2024	LDS	Review proposal from third-party re: debt settlement for consumers; send email to T. McNamara re: same.	0.40	595.00	238.00
08-14-2024	LDS	Meet with team re: third-party claims and update; review materials for potential third-party claims.	1.20	595.00	714.00
08-14-2024	LDS	Investigate claims re: third-party and review documents in Relativity database among StratFS files; draft demand letter re: same.	2.20	595.00	1,309.00
08-14-2024	LDS	Investigate Ice Legal actions and review documents in database among StratFS files re: same.	1.60	595.00	952.00
08-14-2024	LDS	Review responsive email from T. McNamara to Ice Legal.	0.20	595.00	119.00
08-14-2024	KRG	Review third-party claims worksheet memo by A. Wall and circulate to T. McNamara and L. Smith for further review, confer with A. Wall re: same.	0.30	110.00	33.00
08-14-2024	KRG	Attend call with T. McNamara re: Relativity costs of StratFS review and other avenues to consider for document review.	0.50	110.00	55.00
08-14-2024	KRG	Correspond with A. Torry (DISCO) re: interest in DISCO as potential new eDiscovery vendor for StratFS review.	0.20	110.00	22.00
08-14-2024	KRG	Meet with A. Wall, L. Smith, L. Jones, and T. McNamara re: StratFS third-party claims.	1.20	110.00	132.00
08-14-2024	KRG	Correspond with B. Reiss re: StratFS service agreements for Mandaree and Lucky Marketing re: third-party claims; correspond with B. Reiss re: Global compliance audits re: third-party claims.	0.30	110.00	33.00
08-14-2024	KRG	Review Birds Investment money flow analysis from E. LaCorte and circulate thoughts re: same to attorney team.	0.20	110.00	22.00
08-14-2024	KRG	Create StratFS subpoena tracking chart to keep third-party claims process organized.	0.30	110.00	33.00
08-14-2024	KRG	Review Ice Legal related correspondence in Relativity re: third-party claims, preserve hot docs re: same for further review.	1.80	110.00	198.00
08-14-2024	ADW	Meet with T. McNamara, L. Smith and K. Galvin re: preliminary review of potential third-party claims, planning and strategizing potential claims, and next steps.	1.20	495.00	594.00

Date	Professional	Description	Hours	Rate	Amount
08-14-2024	ADW	Meet with K. Galvin re: categorizing potential third-party claims and planning for service of document subpoenas.	0.30	495.00	148.50
08-14-2024	ADW	Perform legal research re: statutes of limitations for potential third-party claims; begin drafting memorandum re: applicable statutes of limitations for various third-party claims.	0.70	495.00	346.50
08-15-2024	ADW	Continue legal research re: statutes of limitations for potential third-party claims and applicable accrual, discovery, and tolling rules; finish drafting memorandum re: applicable statutes of limitations and associated rules for potential third party claims.	1.50	495.00	742.50
08-15-2024	ADW	Review and analyze documents provided by J. O'Donnell re: account of C. Shideler, investigate third-party action filed by C. Shideler against Atlas in North Carolina state court; email to J. O'Donnell re: AmeriLit response.	0.80	495.00	396.00
08-15-2024	ADW	Revise receivership determination letters to Hedgewick Consulting and Bush Lake Trust; email to T. McNamara re: revisions to letters; further revise letters based on comments from T. McNamara and language of Preliminary Injunction.	1.40	495.00	693.00
08-15-2024	LDS	Investigate potential claims against third-party individuals.	1.40	595.00	833.00
08-15-2024	LDS	Continue to investigate claims against Ice Legal who received Receivership Estate funds; confer with T. McNamara re: same.	1.20	595.00	714.00
08-15-2024	ADW	Draft template of Rule 45 document subpoena to Global.	2.10	495.00	1,039.50
08-16-2024	LDS	Participate in conference call with counsel for MMI, MMI, and Receiver; review related materials and follow up with T. McNamara re: same.	1.20	595.00	714.00
08-16-2024	LDS	Investigate third-party target claims with focus on documents among Strategic-related entities; revise demand letter.	1.80	595.00	1,071.00
08-16-2024	ADW	Draft Rule 45 document subpoena to Mandaree and Lucky Enterprises.	1.10	495.00	544.50
08-16-2024	ADW	Review and make final revisions to receivership determination letters to Hedgewick Consulting and Bush Lake Trust.	0.30	495.00	148.50
08-16-2024	ADW	Review VCorp account and filings for Atlas and Timberline re: filings relating to state debt relief licensing.	0.20	495.00	99.00
08-16-2024	ADW	Draft letter to K. Setzer, attorney for C. Shideler,	2.50	495.00	1,237.50

Date	Professional	Description	Hours	Rate	Amount
		re: third-party suit against Atlas, stay of actions, client's dedicated account, and giving notice of lawsuit to AmeriLit.			
08-19-2024	ADW	Email exchange with J. O'Donnell re: response to Atlas client C. Shideler.	0.30	495.00	148.50
08-19-2024	ADW	Call with J. O'Donnell re: C. Shideler's account and response to lawyer.	0.20	495.00	99.00
08-19-2024	ADW	Revise proposed letter to K. Setzer re: C. Shideler third-party lawsuit, based on communications with J. O'Donnell; email letter to T. McNamara for review and comment.	0.50	495.00	247.50
08-19-2024	ADW	Email to F. Mesto at Vervent re: following up on inquiry concerning Vervent's license in Kansas, per request of Kansas regulator.	0.10	495.00	49.50
08-19-2024	ADW	Review, revise, and finalize letter to K. Setzer re: C. Shideler third-party lawsuit, based on communications with J. O'Donnell; add language re: methods of contacting Atlas to discuss proposed Wells Fargo settlement.	0.40	495.00	198.00
08-19-2024	ADW	Continue drafting template of Rule 45 document subpoena to third-party marketers.	1.10	495.00	544.50
08-19-2024	ADW	Meet with T. McNamara, L. Smith, and L. Jones re: status of third-party claim investigations and next steps.	1.00	495.00	495.00
08-19-2024	ADW	Review and analyze time entries to determine total fees re: (1) analysis and response to proposal re: migrating law firm clients to contingency fee model; (2) addressing Intervenor Law Firms' improper communications to consumers; (3) addressing Intervenor Law Firms' motion to compel Receiver to resume law firm model; (4) Strategic Defendants' motion for order to show cause re: compelling Receiver to migrate law firm clients; (5) settlement conference and preparation of associated presentation to Court.	0.80	495.00	396.00
08-19-2024	ADW	Confer with L. Smith multiple times re: issues relating to CIBC settlement.	0.20	495.00	99.00
08-19-2024	LDS	Meet with Receiver and team re: update.	1.00	595.00	595.00
08-19-2024	LDS	Research claims re: third-party in support of same; review filings re: same; confer briefly with Receiver re: same; review filings of other parties and review supporting materials in support of claim.	2.20	595.00	1,309.00
08-20-2024	LDS	Participate in update call with T. McNamara and counsel for Plaintiffs (CFPB and State AGs) and follow-up with Receiver re: same.	1.50	595.00	892.50

Date	Professional	Description	Hours	Rate	Amount
08-20-2024	LDS	Draft and send email re: Versara loan portfolio and follow-up internally re: same.	0.30	595.00	178.50
08-20-2024	LDS	Participate in call with J. O'Donnell and B. Reiss re: update.	1.10	595.00	654.50
08-20-2024	LDS	Draft demand letter to Ice Legal and review related materials contained in Relativity database.	2.20	595.00	1,309.00
08-20-2024	LDS	Investigate potential claims against third parties and review materials in Relativity database re: same.	1.50	595.00	892.50
08-20-2024	LDS	Review proposal of third-party re: debt collection for consumers.	0.30	595.00	178.50
08-20-2024	ADW	Videoconference with CFPB enforcement counsel re: CFPB, consumer protection issues, discovery issues, and related matters.	1.50	495.00	742.50
08-20-2024	ADW	Review Mandaree/MEC and Lucky Marketing-related documents from T. McNamara and L. Jones, re: potential third-party claims.	0.30	495.00	148.50
08-20-2024	ADW	Email to L. Smith and K. Galvin re: topics for call with B. Reiss and J. O'Donnell re: StratFS document assistance.	0.30	495.00	148.50
08-20-2024	ADW	Continue to review and analyze time entries to determine total fees re: (1) analysis and response to proposal re: migrating law firm clients to contingency fee model; (2) addressing Intervenor Law Firms' improper communications to consumers; (3) addressing Intervenor Law Firms' motion to compel Receiver to resume law firm model; (4) Strategic Defendants' motion for order to show cause re: compelling Receiver to migrate law firm clients; (5) settlement conference and preparation of associated presentation to Court.	2.20	495.00	1,089.00
08-20-2024	ADW	Confer multiple times with K. Galvin re: planning for StratFS third-party claims, document and fact management, review of shared document and fact-tracking charts.	0.40	495.00	198.00
08-20-2024	ADW	Videoconference with J. O'Donnell, B. Reiss, and Receiver's team re: investigating potential third-party claims.	1.10	495.00	544.50
08-20-2024	KRG	Draft and send reply to StratFS employee requesting Paid Family Leave.	0.30	110.00	33.00
08-20-2024	KRG	Preserve L. Smith's Mandaree related legal research in third-party claims folder for future review.	0.20	110.00	22.00
08-20-2024	KRG	Attend call with B. Reiss, J. O'Donnell, and attorney team re: third-party claims; review and	1.50	110.00	165.00

Date	Professional	Description	Hours	Rate	Amount
		circulate call recap notes re: same.			
08-20-2024	KRG	Review StratFS board related documents in Relativity re: third-party claims review, save relevant documents in server for further review, confer with A. Wall re: same.	3.10	110.00	341.00
08-20-2024	KRG	Correspond with L. Jones re: organizing Mandaree invoices in third-party claims folder for review of relationship between Mandaree and Lucky Marketing.	0.20	110.00	22.00
08-20-2024	KRG	Review terminated StratFS employees in ADP to create accurate list of COBRA eligible employees who need a COBRA letter mailed; review and mail-merge letter re: same.	0.80	110.00	88.00
08-21-2024	KRG	Correspond with J. Thoman re: details of potential NYC decommission of StratFS office.	0.10	110.00	11.00
08-21-2024	KRG	Correspond with J. O'Donnell and B. Reiss re: items of interest for third-party claims review.	0.20	110.00	22.00
08-21-2024	KRG	Review StratFS inbox list in Relativity, make recommendation to Receiver re: removing unused in-boxes to reduce Relativity costs.	0.30	110.00	33.00
08-21-2024	KRG	Review StratFS inboxes for data rooms information, send follow-up inquiry to B. Reiss re: R. Sason Firmex account.	0.50	110.00	55.00
08-21-2024	KRG	Continue review of Lucky and Mandaree information in Relativity, save and circulate relevant documents, confer with A. Wall re: same.	2.80	110.00	308.00
08-21-2024	KRG	Correspond with COBRA eligible StratFS employee notice of COBRA eligibility.	0.20	110.00	22.00
08-21-2024	ADW	Review correspondence from T. Smith re: overpayment to Versara by his clients; email to T. Smith requesting additional information re: same.	0.40	495.00	198.00
08-21-2024	ADW	Call to A. Lovin at Office of Kansas Commissioner of Banks re: type of license required for Vervent loan servicing (left voicemail); email to F. Mesto at Vervent re: whether license is required, and requesting call to discuss.	0.30	495.00	148.50
08-21-2024	ADW	Meet with K. Galvin re: status of tasks re: potential third-party claims and investigation, discuss tasks, and planning for meeting with full team on 8/22.	0.30	495.00	148.50
08-21-2024	ADW	Legal research re: statute of limitations for fraudulent conveyances in New York, discovery rule, and impact of appointment of Receiver on limitations period.	2.20	495.00	1,089.00

Date	Professional	Description	Hours	Rate	Amount
08-21-2024	LDS	Continue to conduct research re: claims against Ice Legal with focus on materials in Relativity.	1.70	595.00	1,011.50
08-21-2024	LDS	Conduct research re: legal defenses potentially available to Ice Legal.	1.30	595.00	773.50
08-21-2024	LDS	Confer with L. Jones re: contracted agreements for potential third-party claims.	0.20	595.00	119.00
08-21-2024	LDS	Confer with Receiver re: update on potential third-party claims.	0.30	595.00	178.50
08-22-2024	ADW	Confer with K. Galvin re: using Microsoft for document search, status of documents held by Firmex, and review and recent findings re: MELLCC and Lucky Marketing.	0.30	495.00	148.50
08-22-2024	ADW	Review correspondence from Ice Legal demanding payment of retainer funds forwarded by B. Reiss, and add note to third-party claims shared memorandum.	0.30	495.00	148.50
08-22-2024	ADW	Review and analyze documents (agreement and payment schedule, invoices, correspondence) sent by B. Reiss re: Ellison Sales Consulting; draft notes for file and circulate email to team summarizing initial findings.	0.70	495.00	346.50
08-22-2024	ADW	Review documents from B. Reiss re: results of company-wide Lucky Marketing document search.	0.20	495.00	99.00
08-22-2024	KRG	Correspond with B. Reiss re: access to Firmex accounts for third-party individuals, confer with A. Wall re: same.	0.20	110.00	22.00
08-22-2024	KRG	Meet with B. Reiss and J. O'Donnell re: Microsoft eDiscovery possibility and third-party claims related information; draft note to file re: same and circulate to attorney team.	1.60	110.00	176.00
08-22-2024	KRG	Correspond with B. Reiss re: access to Microsoft eDiscovery Premium for third-party claims review.	0.10	110.00	11.00
08-22-2024	KRG	Review Relativity for Box.com data room links, circulate findings to B. Reiss for further analysis.	0.60	110.00	66.00
08-22-2024	KRG	Review Lucky and Mandaree documents for further review re: third-party claims, confer with A. Wall re: same.	1.30	110.00	143.00
08-23-2024	KRG	Update Subpoena Tracking Chart re: StratFS third-party claims.	0.70	110.00	77.00
08-23-2024	KRG	Correspond with H. Quatinetz (Ankura/Relativity) re: request to remove in-boxes from Relativity to reduce Receivership costs.	0.10	110.00	11.00

Date	Professional	Description	Hours	Rate	Amount
08-23-2024	KRG	Meet with attorney team re: third-party claims.	0.90	110.00	99.00
08-23-2024	KRG	Review "Vol003" of Fidelis Production, identify and store documents of interest; circulate summary email of findings to attorney team re: same.	3.10	110.00	341.00
08-23-2024	KRG	Correspond with A. Wall re: review strategy for August 16th Fidelis production.	0.20	110.00	22.00
08-23-2024	KRG	Begin review of Hoover Fidelis production Vol002, identifying and saving key documents to destination folder in the process.	1.90	110.00	209.00
08-23-2024	ADW	Draft agenda for meeting re: investigation of potential third-party claims, and email to team.	0.30	495.00	148.50
08-23-2024	ADW	Call A. Lovin at Office of Kansas Commissioner of Banks re: inquiring about type of state license required for third-party loan servicing.	0.10	495.00	49.50
08-23-2024	ADW	Review and analyze documents and legal research collected re: Mandaree/MELLC, in preparation for meeting with team re: potential third-party claims.	0.90	495.00	445.50
08-23-2024	ADW	Review invoice from Freevoice and send internal email re: payment of phone service invoices.	0.10	495.00	49.50
08-23-2024	ADW	Confer briefly with K. Galvin re: review of latest document production from Fidelis and early findings.	0.20	495.00	99.00
08-23-2024	ADW	Meet with team re: updates and status of potential third-party claim matters, important documents and strategy, and discuss settlement matters and issues re: Fidelis document production.	0.90	495.00	445.50
08-23-2024	ADW	Review and analyze documents from Fidelis' August 16th document production and segregate important documents.	1.20	495.00	594.00
08-23-2024	LDS	Continue to consider needs of consumers and review proposal from NFCC and confer with Receiver re: same.	0.30	595.00	178.50
08-23-2024	LDS	Meet with Receiver's team re: update.	0.90	595.00	535.50
08-23-2024	LDS	Continue to conduct research re: third-party claims and prepare demand letter re: same; review materials in support of same.	1.30	595.00	773.50
08-26-2024	LDS	Draft website update on receivership for website and review related materials.	0.30	595.00	178.50
08-26-2024	LDS	Continue to investigate Ice Legal third-party claim and conduct related legal research on client file, ethics, and true retainer.	2.20	595.00	1,309.00

Date	Professional	Description	Hours	Rate	Amount
08-26-2024	ADW	Review Preliminary Injunction re: specific language authorizing Receiver to conduct discovery.	0.20	495.00	99.00
08-26-2024	ADW	Continue reviewing documents from Fidelis's August 16th document production and segregating important documents.	1.80	495.00	891.00
08-26-2024	ADW	Perform legal research re: attorney "true" retainer fees and legal requirements under New York state law.	0.70	495.00	346.50
08-26-2024	KRG	Correspond with H. Quanitez re: removal of inboxes from Relativity to reduce Receivership costs	0.10	110.00	11.00
08-26-2024	KRG	Continue to review hot docs re: Lucky and Mandaree for further review re: third-party claims.	0.90	110.00	99.00
08-26-2024	KRG	Review preserved document index for Lucky Marketing and Mandaree related documents, review documents, circulate same to A. Wall for review, confer with A. Wall re: same.	1.20	110.00	132.00
08-26-2024	KRG	Review preserved document index for Signature Bank documents, provide same to L. Jones for review.	0.50	110.00	55.00
08-27-2024	KRG	Continue to review and rename hot docs re: Lucky and Mandaree for further review re: third-party claims, confer with A. Wall re: same.	0.50	110.00	55.00
08-27-2024	KRG	Research cases, collections, and review sets on Microsoft eDiscovery Premium for StratFS third-party claims.	1.20	110.00	132.00
08-27-2024	KRG	Correspond with B. Reiss re: review of Box.com "Advisory Board" and "Board of Directors" data rooms.	0.10	110.00	11.00
08-27-2024	KRG	Correspond with B. Reiss re: limited access to Microsoft SharePoint sites.	0.10	110.00	11.00
08-27-2024	KRG	Research Firmex's physical address and email information for letter to Firmex re: StratFS data rooms.	0.20	110.00	22.00
08-27-2024	KRG	Meet with attorney team re: StratFS third-party claims.	1.20	110.00	132.00
08-27-2024	KRG	Correspond with L. Smith re: search terms provided for Hoover Fidelis production.	0.10	110.00	11.00
08-27-2024	KRG	Meet with B. Reiss re: Microsoft SharePoint and Microsoft eDiscovery Premium access and search logistics.	0.90	110.00	99.00

Date	Professional	Description	Hours	Rate	Amount
08-27-2024	ADW	Research requirements re: Supervised Lender License in Kansas.	0.20	495.00	99.00
08-27-2024	ADW	Draft agenda for meeting re: potential third-party claims, and email to team.	0.20	495.00	99.00
08-27-2024	ADW	Review and revise draft subpoena to third-party marketing companies.	0.30	495.00	148.50
08-27-2024	ADW	Research Lucky Marketing and MELLCC vendor Swiftkick Web; order and review copies of New Jersey corporate records for Swiftkick; modify draft subpoena to third-party marketers re: proper name of Swiftkick Web.	0.60	495.00	297.00
08-27-2024	ADW	Meet with team re: updates and status of potential third-party claim matters and related issues, particularly issues relating to ongoing settlement discussions, timing of discovery, Ice Legal, and Lucky Marketing.	1.20	495.00	594.00
08-27-2024	ADW	Confer briefly with K. Galvin re: Fidelis document production deficiencies and document review re: merchant processors.	0.20	495.00	99.00
08-27-2024	ADW	Draft proposed response to employee inquires re: return of funds in Strategic ESOP.	0.20	495.00	99.00
08-27-2024	ADW	Review and analyze Preliminary Injunction and other orders of Court re: Receiver's authorization to conduct third-party discovery, and timing of such discovery.	0.30	495.00	148.50
08-27-2024	ADW	Confer briefly with K. Galvin re: Lucky Marketing settlement with US Mortgage Corp.	0.10	495.00	49.50
08-27-2024	LDS	Meet with team re: update.	1.20	595.00	714.00
08-27-2024	LDS	Confer with T. McNamara re: Versara and related accounts.	0.40	595.00	238.00
08-27-2024	LDS	Draft prelitigation demand letter and consider next steps in investigation of Ice Legal claim with review of materials in Relativity database; circulate draft of same.	2.10	595.00	1,249.50
08-28-2024	LDS	Review emails re: Fidelis and circulate same internally.	0.30	595.00	178.50
08-28-2024	LDS	Continue to investigate third-party claims and send internal emails re: same.	0.50	595.00	297.50
08-28-2024	LDS	Continue to draft and send website update and review docket/materials re: same.	0.40	595.00	238.00
08-28-2024	LDS	Investigate claims re: third-party and consider	0.70	595.00	416.50

Date	Professional	Description	Hours	Rate	Amount
		potential settlement of claims; review related documents.			
08-28-2024	ADW	Draft letter to Firmex, StratFS's data room vendor, re: preliminary injunction, document request, and possible recovery of deleted/removed documents; confer internally re: suggested revisions and corrections.	1.80	495.00	891.00
08-28-2024	ADW	Review and analyze documents re: Lucky Marketing's connections to StratFS; research Lucky Marketing's ownership, management, and formation documents, and associated individuals; draft letter to Lucky Marketing re: determination of status as Receivership Defendant.	2.10	495.00	1,039.50
08-29-2024	ADW	Meet with team re: investigation of potential third-party claims, update re: merchant processors, Ice Legal, Lucky Marketing, Versara loans, new document review platform.	0.50	495.00	247.50
08-29-2024	ADW	Continue performing research and reviewing documents re: Lucky Marketing, particularly concerning relationships with Strategic entities, Mandaree entities, and individual defendants.	2.50	495.00	1,237.50
08-29-2024	ADW	Research Mandaree Enterprises and related entities' corporate office locations.	0.30	495.00	148.50
08-29-2024	LDS	Investigate Versara based on request of consumer reaching out to CFPB; send related emails re: same.	1.40	595.00	833.00
08-29-2024	LDS	Participate in internal update meeting.	0.50	595.00	297.50
08-29-2024	KRG	Meet with T. McNamara, L. Smith, L. Jones, and A. Wall re: third-party claims.	0.50	110.00	55.00
08-29-2024	KRG	Meet with B. Reiss re: operation logistics for searches and review sets in Microsoft eDiscovery platform.	0.80	110.00	88.00
08-29-2024	KRG	Correspond with H. Quanitez (Ankura/Relativity) re: removal of inboxes from Relativity to reduce Receivership costs.	0.10	110.00	11.00
08-29-2024	KRG	Correspond with J. Bernstein re: updates on potential NYC office decommission.	0.10	110.00	11.00
08-29-2024	KRG	Review Ice Legal related documents in Microsoft eDiscovery platform for third-party claims.	3.40	110.00	374.00
08-29-2024	KRG	Gather settlement agreements for Ice Legal class action lawsuit from Microsoft eDiscovery platform re: third-party claims related review.	1.20	110.00	132.00
08-29-2024	KRG	Conduct searches in Microsoft eDiscovery of	0.60	110.00	66.00

Date	Professional	Description	Hours	Rate	Amount
		StratFS potential third-party claims.			
08-29-2024	KRG	Review Mandaree and Lucky Marketing related documents in Microsoft eDiscovery platform re: third-party claims.	0.80	110.00	88.00
08-30-2024	KRG	Confer with A. Wall re: Ice Legal hot documents and future steps for potential claim.	0.30	110.00	33.00
08-30-2024	KRG	Continue review of Ice Legal content on Microsoft eDiscovery platform, identify and rename hot docs in chronological order for further review, circulate summary of findings to attorney team.	4.50	110.00	495.00
08-30-2024	LDS	Review email response from Ice Legal and consider response re: same.	0.40	595.00	238.00
			Total	177.30	65,635.00

Time Summary

Professional	Hours	Rate	Amount
Alexander D. Wall	68.30	495.00	33,808.50
Keegan Galvin	68.10	110.00	7,491.00
Logan D. Smith	40.90	595.00	24,335.50
Total	177.30		65,635.00

Expenses

Date	Description	Amount
08-31-2024	Online research: Westlaw	39.95
	Total Expenses	39.95
	Total for this Invoice	65,674.95



L A W Y E R S

September 30, 2024

Invoice Period: 09-01-2024 - 09-30-2024

RE: 2158.02 MS

StratFS Receivership

Time Details

Date	Professional	Description	Hours	Rate	Amount
09-02-2024	KRG	Continue review of Ice Legal correspondence in Microsoft eDiscovery, identify relevant documents for further review and discussion, rename documents to include document dates.	2.70	110.00	297.00
09-03-2024	KRG	Continue review of Ice Legal correspondence in Microsoft eDiscovery, identify relevant documents for further review and discussion, confer with A. Wall re: same.	1.20	110.00	132.00
09-03-2024	KRG	Create search in Microsoft eDiscovery Portal for Global and RAM related correspondence, review search results, identify relevant documents for further review and discussion.	3.00	110.00	330.00
09-03-2024	LDS	Confer with counsel for Plaintiffs (CFPB and State AGs) re: update.	0.70	595.00	416.50
09-03-2024	LDS	Conduct legal research on ownership of client file and draft email re: same.	0.60	595.00	357.00
09-03-2024	LDS	Continue to draft demand letter to Ice Legal re: claims.	1.20	595.00	714.00
09-03-2024	LDS	Revise Fee Application and review supporting invoices to be submitted to the Court.	2.40	595.00	1,428.00
09-03-2024	ADW	Videoconference with L. Smith and counsel for CFPB re: update.	0.70	495.00	346.50
09-03-2024	ADW	Review and revise letter to Firmex re: data room account identification and access; review, revise, and re-structure letter to Box.com re: same.	0.80	495.00	396.00
09-03-2024	ADW	Confer with K. Galvin re: specific demands in Receiver's letters to Firmex and Box.com.	0.10	495.00	49.50
09-03-2024	KRG	Correspond with B. Reiss and A. Wall re: inquiry to Box.com re: data rooms for Strategic executives.	0.30	110.00	33.00

Date	Professional	Description	Hours	Rate	Amount
09-03-2024	KRG	Confer with H. Quatinetz (Ankura/Relativity rep) re: bill start date for Relativity database.	0.10	110.00	11.00
09-03-2024	KRG	Edit A. Wall's draft letter to Box.com re: StratsFS data rooms of interest and data rooms to remain operable.	0.50	110.00	55.00
09-03-2024	KRG	Research contact information for Box.com legal team, send information re: same to A. Wall.	0.30	110.00	33.00
09-03-2024	ADW	Confer with K. Galvin re: Ice Legal documents.	0.20	495.00	99.00
09-04-2024	KRG	Meet with J. O'Donnell, A. Wall, and L. Smith re: payment processors.	1.20	110.00	132.00
09-04-2024	KRG	Confer with A. Wall re: future progression of third-party claims, and findings re: payment processors and law firms.	0.60	110.00	66.00
09-04-2024	KRG	Identify significant Ice Legal correspondence and email same to L. Smith re: third-party claims.	0.50	110.00	55.00
09-04-2024	KRG	Continue to review Ice Legal correspondence re: StratFS third-party claims.	0.80	110.00	88.00
09-04-2024	KRG	Correspond with B. Reiss re: requesting Microsoft eDiscovery accounts be created for L. Smith and A. Wall.	0.20	110.00	22.00
09-04-2024	ADW	Videoconference with J. O'Donnell, L. Smith, and K. Galvin re: information relating to Strategic's and Law Firms' Global relationships with payment processor; confer briefly with L. Smith following videoconference.	1.20	495.00	594.00
09-04-2024	ADW	Review and revise 2nd Interim Fee Application and supporting Declaration, including general editing and adding sections re: Receiver's work and work of retained professionals.	1.20	495.00	594.00
09-04-2024	ADW	Meet with K. Galvin re: continued investigation, potential claims, and next steps.	0.60	495.00	297.00
09-04-2024	ADW	Final pre-filing review and editing of Receiver's 2nd Interim Fee Application and supporting Declaration.	0.40	495.00	198.00
09-04-2024	LDS	Continue to review Receiver's Fee Application and make suggested revisions thereto; review new versions throughout day.	2.20	595.00	1,309.00
09-04-2024	LDS	Review and revise versions of declaration of T. McNamara in support of fee application.	1.80	595.00	1,071.00
09-04-2024	LDS	Continue to review supporting invoices and materials for fee application.	1.40	595.00	833.00

Date	Professional	Description	Hours	Rate	Amount
09-04-2024	LDS	Confer with L. Jones re: write up of tasks of forensic accountant for fee application and include section in fee application and declaration.	0.50	595.00	297.50
09-04-2024	LDS	Confer with J. O'Donnell for portion of call with A. Wall and K. Galvin.	0.50	595.00	297.50
09-04-2024	LDS	Confer with K. Galvin re: third-party claims and searching of documents re: same.	0.30	595.00	178.50
09-05-2024	LDS	Meet with team and Receiver re: update and follow-up steps re: claims.	1.20	595.00	714.00
09-05-2024	LDS	Continue to draft demand letter re: Ice Legal.	1.20	595.00	714.00
09-05-2024	LDS	Consider issues re: Versara and flow of funds.	0.50	595.00	297.50
09-05-2024	ADW	Meet with team re: investigation of potential third-party claims, update re: numerous issues including discussions with Plaintiffs, call with J. O'Donnell re: merchant processors, potential attorney claims, and issues re: Versara, filing tax returns, identifying vendor payments, etc.	1.20	495.00	594.00
09-05-2024	ADW	Meet with K. Galvin for training re: using Microsoft eDiscovery document review platform to collect and review StratFS documents.	0.50	495.00	247.50
09-05-2024	KRG	Review payment processor correspondence in Microsoft eDiscovery Portal, identify relevant documents for review re: same.	1.40	110.00	154.00
09-05-2024	KRG	Draft and edit call notes from call with J. O'Donnell re: payment processors, circulate same to attorney team.	0.60	110.00	66.00
09-05-2024	KRG	Ship box to H. Pastor to return laptop to StratFS IT.	0.30	110.00	33.00
09-05-2024	KRG	Meet with A. Wall re: navigating and creating cases in Microsoft eDiscovery.	0.50	110.00	55.00
09-05-2024	KRG	Meet with attorney team re: StratFS third-party claims.	1.20	110.00	132.00
09-06-2024	KRG	Continue to review Global correspondence in Microsoft eDiscovery Portal, identify relevant documents for review re: same.	2.40	110.00	264.00
09-06-2024	ADW	Review Thurman Legal's May 2016 analysis and opinions re: Telemarketing Sales Rule requirements and cases, prepared for Strategic; review CFPB's 2014 Consent Order re: Global Client Services, and analyze due diligence and monitoring requirements for purposes of ongoing claim investigation.	1.20	495.00	594.00
09-07-2024	LDS	Review materials re: Versara and flow of funds	0.40	595.00	238.00

Date	Professional	Description	Hours	Rate	Amount
		and send related email to L. Jones and T. McNamara.			
09-09-2024	LDS	Meet with B. Reiss and J. O'Donnell and J. Thoman and others re: Versara flow of funds.	1.20	595.00	714.00
09-09-2024	LDS	Investigate issues re: Versara and review materials provided by B. Reiss.	0.80	595.00	476.00
09-09-2024	LDS	Review CIBC settlement material and related documents.	1.40	595.00	833.00
09-09-2024	LDS	Meet with team and Receiver re: update.	1.10	595.00	654.50
09-09-2024	LDS	Investigate issue re: Versara/Verent and send email to J. O'Donnell and B. Reiss re: same.	0.30	595.00	178.50
09-09-2024	LDS	Participate in call with J. Thoman and T. McNamara re: latest draft of settlement agreement with banks; provide feedback to J. Thoman re: edits to settlement agreement.	0.80	595.00	476.00
09-09-2024	ADW	Call with J. Thoman and L. Jones re: state registration requirements for Versara Lending.	0.30	495.00	148.50
09-09-2024	ADW	Meet with team re: potential third-party claims, update re: issues including potential claims against payment processors, Versara Lending issues, Lucky Marketing.	1.10	495.00	544.50
09-09-2024	KRG	Correspond with S. Barnes (Principal) re: BBB complaint from StratFS employee.	0.10	110.00	11.00
09-09-2024	KRG	Meet with attorney team re: StratFS potential third-party claims.	1.10	110.00	121.00
09-10-2024	KRG	Review Mandaree and Strategic correspondence and related documents in Microsoft eDiscovery portal.	1.00	110.00	110.00
09-10-2024	KRG	Review correspondence with Sasson and Lemberg, identify relevant documents for further review.	2.20	110.00	242.00
09-10-2024	KRG	Create search in Microsoft eDiscovery portal for S. Duchon and Timberline Capital related documents for StratFS potential third-party claims.	0.30	110.00	33.00
09-10-2024	KRG	Correspond with Firmex re: previously sent letter to Firmex for data room access for StratFS accounts.	0.40	110.00	44.00
09-10-2024	KRG	Attend Teams meeting with B. Reiss re: Microsoft eDiscovery database searching and Timberline Capital/Timberline Financial structure.	1.00	110.00	110.00

Date	Professional	Description	Hours	Rate	Amount
09-10-2024	KRG	Correspond with T. McNamara and A. Wall re: Strategic's access to Box.com data rooms.	0.10	110.00	11.00
09-10-2024	ADW	Videoconference with B. Reiss and K. Galvin re: Microsoft eDiscovery document review platform and Timberline Capital.	1.00	495.00	495.00
09-10-2024	LDS	Confer with T. McNamara re: Versara and review related documents.	0.40	595.00	238.00
09-10-2024	LDS	Confer with L. Jones and T. McNamara re: CIBC and Versara.	0.30	595.00	178.50
09-10-2024	LDS	Confer with K. Galvin re: third-party claims and review document found re: Mandaree.	0.30	595.00	178.50
09-11-2024	LDS	Review revised draft of CIBC settlement documents and evaluate issues re: collateral and proposed new provisions; review related emails.	0.60	595.00	357.00
09-11-2024	LDS	Review claims against third-party and related documents and confer with T. McNamara briefly re: same.	0.60	595.00	357.00
09-11-2024	LDS	Draft complaint re: Ice Legal and review supporting documents.	1.20	595.00	714.00
09-11-2024	LDS	Review emails re: Versara consumers with potential for recalculation or return of portion of loans.	0.30	595.00	178.50
09-11-2024	KRG	Review Timberline Capital and S. Duchon related correspondence, identify relevant documents for further review.	2.00	110.00	220.00
09-11-2024	KRG	Review Mandaree and Strategic correspondence in Microsoft eDiscovery portal re: mailer relationship; identify related documents for further review.	2.20	110.00	242.00
09-11-2024	KRG	Continue review of S. Duchon and Timberline Capital correspondence for potential StratFS third-party claims.	0.80	110.00	88.00
09-11-2024	KRG	Correspond with J. O'Donnell re: follow-up on requests for information on Global and RAM complaint tracking.	0.20	110.00	22.00
09-12-2024	KRG	Continue review of Global correspondence in Microsoft eDiscovery Platform.	0.60	110.00	66.00
09-12-2024	KRG	Prepare to meet with attorney team re: StratFS third-party claims by culling Mandaree and Timberline Capital related documents identified in Microsoft eDiscovery portal for discussion.	1.90	110.00	209.00
09-12-2024	KRG	Meet with T. McNamara, L. Smith, A. Wall, and L.	0.90	110.00	99.00

Date	Professional	Description	Hours	Rate	Amount
		Jones re: StratFS third-party claims.			
09-12-2024	KRG	Review Timberline MCA and F. Driscoll correspondence re: MCA loan for T. McNamara, provide documents re: same to T. McNamara for review.	0.70	110.00	77.00
09-12-2024	KRG	Continue review of Mandaree and Strategic correspondence in Microsoft eDiscovery Portal re: contracts with third-party vendors for mailer model, identify and preserve relevant documents for further review.	0.80	110.00	88.00
09-12-2024	LDS	Meet with team re: update on third-party claims.	0.90	595.00	535.50
09-12-2024	LDS	Continue to draft complaint and review materials re: Ice Legal.	1.50	595.00	892.50
09-12-2024	LDS	Investigate claims against Mandaree and consider potential claims.	0.80	595.00	476.00
09-12-2024	ADW	Draft agenda for team meeting re: investigation of potential third-party claims, and circulate to team.	0.20	495.00	99.00
09-12-2024	ADW	Review and analyze email from Box.com responding to demand for records and account access.	0.50	495.00	247.50
09-12-2024	ADW	Meet with third-party claims team re: ongoing investigation of potential third-party claims, and review of important newly-discovered documents concerning Lucky Marketing, Mandaree entities, Timberline-related entities, potential claims, and related issues.	0.90	495.00	445.50
09-13-2024	KRG	Correspond with T. Wisner re: deadline for employees to retroactively un-enroll in COBRA coverage.	0.20	110.00	22.00
09-13-2024	KRG	Continue review of Mandaree and Strategic correspondence re: contracts with third-party vendors for mailer model, identify and preserve relevant documents for further review.	2.80	110.00	308.00
09-13-2024	KRG	Draft email recapping review of vendor contracts for Mandaree mailer model, circulate review and relevant documents re: same to attorney team for review.	1.80	110.00	198.00
09-13-2024	KRG	Correspond with J. Bernstein re: updates on potential decommissioning of NYC office site.	0.10	110.00	11.00
09-16-2024	KRG	Review Fidelis production text messages and Teams chat documents for gaps in communication, draft analysis re: same.	2.50	110.00	275.00
09-16-2024	LDS	Participate in update conference with T.	0.50	595.00	297.50

Date	Professional	Description	Hours	Rate	Amount
		McNamara and Plaintiffs' counsel.			
09-16-2024	LDS	Confer with J. Thoman and T. McNamara re: update and next steps in advance of hearing.	0.80	595.00	476.00
09-16-2024	LDS	Participate in call with CIBC's counsel and T. McNamara and J. Thoman re: settlement discussions.	0.60	595.00	357.00
09-16-2024	LDS	Confer with J. Thoman and T. McNamara re: follow-up.	0.40	595.00	238.00
09-16-2024	LDS	Evaluate issues in advance of hearing and consider potential list of topics for discussion.	0.50	595.00	297.50
09-16-2024	LDS	Consider issues re: running of Versara and review related emails; send related emails as follow-up.	0.50	595.00	297.50
09-16-2024	LDS	Confer with counsel for Texas OCCC re: Versara.	0.40	595.00	238.00
09-16-2024	LDS	Review appeal by Blust Trust and consider whether response by Receiver is necessary; confer with Receiver re: same.	0.50	595.00	297.50
09-17-2024	LDS	Follow up on issues re: Texas OCCC inquiry and review and send related emails.	0.30	595.00	178.50
09-17-2024	LDS	Meet with team re: update on third-party claims.	0.90	595.00	535.50
09-17-2024	LDS	Draft outline for T. McNamara in anticipation of hearing with Court and confer internally re: same.	0.50	595.00	297.50
09-17-2024	ADW	Review document subpoena addressed to Atlas from Florida bankruptcy matter; email to T. McNamara with information and proposed next steps.	0.40	495.00	198.00
09-17-2024	ADW	Review email from Salesforce re: legacy API versions and forward to B. Reiss for attention.	0.20	495.00	99.00
09-17-2024	ADW	Review newly discovered key documents re: Mandaree entities' involvement and lengthy email from K. Galvin summarizing recent findings re: Mandaree entities and potential sovereign immunity defenses.	0.40	495.00	198.00
09-17-2024	ADW	Review summaries of active migrated and non-migrated Versara DNL loans to Kansas borrowers; email to A. Lovin in Kansas Commissioner of Bank's office with loan summaries.	0.30	495.00	148.50
09-17-2024	KRG	Begin index of Fidelis Hoover production.	4.50	110.00	495.00
09-17-2024	KRG	Meet with T. McNamara, L. Smith, L. Jones, and A. Wall re: third-party claims.	0.90	195.00	175.50

Date	Professional	Description	Hours	Rate	Amount
09-17-2024	KRG	Confer with A. Wall re: process moving forward re: StratFS third-party claims and information T. McNamara should address with judge in upcoming hearing.	0.20	110.00	22.00
09-17-2024	ADW	Meet with T. McNamara, L. Smith, L. Jones, and K. Galvin re: third-party claims.	0.90	495.00	445.50
09-17-2024	ADW	Meet with L. Jones, and K. Galvin re: cash advances to vendors.	0.40	495.00	198.00
09-17-2024	KRG	Meet with L. Jones, and A. Wall re: cash advances to vendors.	0.40	195.00	78.00
09-18-2024	KRG	Rerun Global executive correspondence search in Microsoft eDiscovery platform.	0.10	110.00	11.00
09-18-2024	KRG	Create collection and review set for Monevo correspondence in Microsoft eDiscovery portal re: third-party claims.	0.30	110.00	33.00
09-18-2024	KRG	Continue index of Fidelis Hoover production for potential further review.	2.90	110.00	319.00
09-18-2024	KRG	Review and revise list of issues T. McNamara should address with the judge in chambers at StratFS hearing, circulate to A. Wall for further review.	0.30	110.00	33.00
09-18-2024	KRG	Correspond with former StratFS employee re: retroactively canceling COBRA coverage.	0.10	110.00	11.00
09-18-2024	KRG	Correspond with former StratFS employee re: COBRA enrollment removal request.	0.20	110.00	22.00
09-18-2024	LDS	Prepare materials in advance of hearing covering pending motions and circulate same to Receiver; draft outline in support of same.	1.80	595.00	1,071.00
09-18-2024	LDS	Confer with T. McNamara re: upcoming hearing.	0.30	595.00	178.50
09-18-2024	ADW	Review notice of arbitration in North Carolina state court matter re: Atlas Debt Relief; review North Carolina Rules for Court-Ordered Arbitration re: process for assignment of arbitrator; confer with T. McNamara re: next steps; schedule follow-up reminder for sending notice of Preliminary Injunction to assigned arbitrator.	0.90	495.00	445.50
09-18-2024	ADW	Review all orders and minute entries regarding the OSC motions re: Intervenor Law Firms and J. Blust / Lit Def Strategies, and Fidelis Legal Support's motion challenging the Receiver's determination; send email to L. Smith with current status of all pending motions and applicable orders/entries.	0.40	495.00	198.00

Date	Professional	Description	Hours	Rate	Amount
09-18-2024	ADW	Review records re: frozen bank accounts of StratFS-related entities; confer with L. Smith re: potential receivership assets; revise internal memorandum for T. McNamara re: Receiver's ongoing and upcoming receivership matters, for discussion at conference on 9/20.	1.20	495.00	594.00
09-19-2024	ADW	Call with A. Lovin in Office of Kansas Commissioner of Banks re: status of Versara and Vervent loan migrations.	0.20	495.00	99.00
09-19-2024	ADW	Review, analyze, and annotate documents re: Monevo, including agreement with Strategic, Insertion Orders, invoices and reconciliation, and correspondence with Receiver.	1.30	495.00	643.50
09-19-2024	ADW	Review email from consumer re: Northstar Legal Group and potential negotiated settlement; forward to J. O'Donnell with request for client account information.	0.30	495.00	148.50
09-19-2024	ADW	Draft agenda for team meeting re: potential third-party claims and investigations, and email team for input/suggestions.	0.20	495.00	99.00
09-19-2024	ADW	Meet with team re: potential third-party claims, update re: Monevo claim, Ice Legal, investigation of investment entities, and related issues.	0.50	495.00	247.50
09-19-2024	LDS	Participate in update conference with T. McNamara and internal team.	0.50	595.00	297.50
09-19-2024	KRG	Review of identified LLC's to investigate ownership relationship re: StratFS third-party claims.	5.30	110.00	583.00
09-19-2024	KRG	Conduct Relativity search for VCorp credentials for StratFS.	0.60	110.00	66.00
09-20-2024	KRG	Review and prepare COBRA election deadline letters to be sent to former StratFS employees.	2.50	110.00	275.00
09-20-2024	KRG	Review Monevo agreement and identify important aspects of agreement re: breach of contract, and confer with A. Wall re: dispute resolution.	0.40	110.00	44.00
09-20-2024	LDS	Confer with T. McNamara re: update and consider next steps following hearing.	0.50	595.00	297.50
09-23-2024	LDS	Continue to consider next steps following hearing with Court.	0.50	595.00	297.50
09-23-2024	LDS	Participate in meeting re: update on third-party cases.	0.40	595.00	238.00
09-23-2024	LDS	Prepare for and participate in call with Plaintiffs counsel and follow up with T. McNamara re: same;	0.60	595.00	357.00

Date	Professional	Description	Hours	Rate	Amount
		send follow-up email re: same.			
09-23-2024	ADW	Videoconference with Receiver, L. Smith, and counsel for Plaintiff re: Fidelis and Lit Def documents and related issues.	0.50	495.00	247.50
09-23-2024	ADW	Meet with team re: investigation of potential third-party claims, to discuss issues re: parties' settlement discussions, Mandaree entities, Lucky Marketing, and related matters.	0.40	495.00	198.00
09-23-2024	ADW	Review and analyze correspondence to StratFS re: consumer complaints, bankruptcy filings, and other consumer-related matters; decide on responses; multiple emails to J. O'Donnell with requests for relevant consumer information.	1.80	495.00	891.00
09-23-2024	KRG	Correspond with Ankura and CFPB re: production of Lit Def email in-boxes to CFPB.	0.30	110.00	33.00
09-23-2024	KRG	Create note to file re: Firmex correspondence re: data room.	0.30	110.00	33.00
09-23-2024	KRG	Meet with attorney team re: StratFS third-party claims.	0.40	110.00	44.00
09-23-2024	KRG	Confer with Ankura rep re: scope of Lit Def production, and options for production format.	0.20	110.00	22.00
09-23-2024	KRG	Confer with T. McNamara re: production of Lit Def in-boxes to CFPB, email Ankura re: same.	0.20	110.00	22.00
09-23-2024	KRG	Review Microsoft eDiscovery for Firmex URL, circulate same to Firmex support team.	0.30	110.00	33.00
09-23-2024	KRG	Update records request tracking chart to include Firmex updates re: data room.	0.10	110.00	11.00
09-24-2024	ADW	Draft complaint against third-party Monevo re: unpaid commissions for loan referrals; review Monevo-related documents and correspondence; perform legal research re: pleading breach of contract and related claims in New York.	5.30	495.00	2,623.50
09-24-2024	ADW	Review, revise, and approve letter in response to garnishment order re: former SFS employee.	0.30	495.00	148.50
09-24-2024	ADW	Call with A. Mendez, counsel for Chapter 7 Trustee in Florida bankruptcy matter, re: document subpoena from Trustee to Atlas Debt Relief; send email to T. McNamara with file note re: conversation with A. Mendez.	0.30	495.00	148.50
09-24-2024	KRG	Correspond with CFPB and Ankura re: production of Lit Def email in-boxes to CFPB for review.	0.30	110.00	33.00
09-24-2024	KRG	Conduct Relativity searches for third-party	1.10	110.00	121.00

Date	Professional	Description	Hours	Rate	Amount
		individual's correspondence with T. Elliott re: StratFS third-party claims.			
09-24-2024	KRG	Correspond with T. McNamara re: Blust informal discovery production index and index of Lit Def email production.	0.20	110.00	22.00
09-24-2024	LDS	Continue to consider next steps following hearing and review related emails.	0.30	595.00	178.50
09-25-2024	KRG	Correspond with Ankura and CFPB re: progress on shipping of Lit Def email in-boxes hard drive from Ankura facility to CFPB for review.	0.30	110.00	33.00
09-25-2024	KRG	Correspond with T. McNamara re: Blust informal discovery production to be sent to CFPB.	0.10	110.00	11.00
09-25-2024	KRG	Upload .pst files received from Blust's counsel to CFPB extranet for review.	0.40	110.00	44.00
09-25-2024	ADW	Call with L. Jones re: adding related entities Cell Gramercy 2, Strategic LD, and Versara DST as Receivership Defendants and discussion.	0.50	495.00	247.50
09-25-2024	ADW	Review documents re: Strategic LD, LLC and relationship to other Strategic entities and principals; draft letter to Strategic LD, LLC c/o D. Vacco re: notice of determination that entity is a Receivership Defendant.	1.00	495.00	495.00
09-25-2024	ADW	Review documents re: Versara DST; confer with L. Jones re: Versara DST relationship to Versara Lending and Strategic entities; draft letter to Versara DST c/o D. Vacco re: notice of determination that entity is a Receivership Defendant.	1.20	495.00	594.00
09-25-2024	ADW	Review documents re: Cell Gramercy 2; draft letter to Cell Gramercy 2 c/o D. Vacco re: notice of determination that entity is a Receivership Defendant.	0.90	495.00	445.50
09-25-2024	ADW	Continue drafting complaint against third-party Monevo re: unpaid commissions for loan referrals; perform legal research re: pleading unjust enrichment claims in New York and in the Second Circuit; email to C. Ball re: prior invoicing of amounts due from Monevo.	1.00	495.00	495.00
09-26-2024	ADW	Finish drafting complaint against third-party Monevo.	0.50	495.00	247.50
09-26-2024	ADW	Meet with team re: potential third-party claims and investigations, discuss updates re: Monevo, Mandaree, Ice Legal, upcoming hearings, and related matters.	0.60	495.00	297.00
09-26-2024	ADW	Legal research re: enforcement of pre-receivership	1.10	495.00	544.50

Date	Professional	Description	Hours	Rate	Amount
		arbitration clauses against Receiver in Second Circuit and other courts.			
09-26-2024	KRG	Draft list of topics to be discussed at third-party claims meeting, send to A. Wall for further review.	0.20	110.00	22.00
09-26-2024	KRG	Correspond with Ankura re: cost of cold storage or ARM export of Relativity database.	0.20	110.00	22.00
09-26-2024	KRG	Review Box.com response re: data rooms, search for email addresses that could be associated with box accounts and data rooms, send email addresses re: same to A. Wall.	0.60	110.00	66.00
09-26-2024	KRG	Confer with T. McNamara re: sending replacement laptops to E. Rovner (StratFS) to replenish reserve stock.	0.10	110.00	11.00
09-26-2024	KRG	Create case for third-party individual's related documents in Microsoft eDiscovery platform, began reviewing same.	1.00	110.00	110.00
09-26-2024	KRG	Meet with T. McNamara, L. Smith, A. Wall, and L. Jones re: StratFS third-party claims.	0.60	110.00	66.00
09-26-2024	KRG	Correspond with Ankura Relativity team requesting Database be moved to ARM export and shipped to Receiver's office.	0.20	110.00	22.00
09-26-2024	KRG	Begin chronology of Mandaree related StratFS emails and documents re: third-party claims.	1.10	110.00	121.00
09-26-2024	LDS	Meet with team re: third-party claims.	0.60	595.00	357.00
09-26-2024	LDS	Review Ice Legal complaint and circulate same to A. Wall for his review.	0.50	595.00	297.50
09-27-2024	LDS	Draft reply in response to Blust Trust and circulate edits to T. McNamara for review and review suggested edits of T. McNamara; conduct related legal research.	2.40	595.00	1,428.00
09-27-2024	KRG	Continue review of Mandaree correspondence in Microsoft eDiscovery re: chronology for potential third-party claim.	0.90	110.00	99.00
09-27-2024	KRG	Draft memo re: decision to move Relativity database to ARM export.	0.50	110.00	55.00
09-27-2024	KRG	Continue chronology of Mandaree related StratFS emails and documents re: third-party claims.	3.40	110.00	374.00
09-27-2024	KRG	Confer with L. Jones re: TMTTM line in Mandaree invoice, conduct searches in Microsoft eDiscovery re: same.	0.20	110.00	22.00

Date	Professional	Description	Hours	Rate	Amount
09-27-2024	ADW	Review and analyze StratFS's invoices to Monevo from 2021-23 to confirm prior invoicing of amounts currently due; send email internally re: invoiced amounts; revise complaint against Monevo re: prior invoicing of commission payments due.	1.30	495.00	643.50
09-30-2024	ADW	Conduct further case law research re: enforceability of arbitration provision against federal equity Receiver.	1.20	495.00	594.00
09-30-2024	ADW	Review and revise draft complaint re: Ice Legal.	1.00	495.00	495.00
09-30-2024	ADW	Meeting with T. McNamara, L. Jones, L. Smith, and K. Galvin re: third-party claims and research related to Receivership Defendant assets.	0.50	495.00	247.50
09-30-2024	LDS	Meet with team re: third-party claims regarding Receivership Assets.	0.50	595.00	297.50
09-30-2024	KRG	Meeting with T. McNamara, L. Jones, A. Wall, and L. Smith re: third-party claims and research related to Receivership Defendant assets.	0.50	195.00	97.50
09-30-2024	LDS	Review and revise reply in response to Blust Trust and finalize for filing.	0.50	595.00	297.50
			Total	155.70	53,043.00

Time Summary

Professional	Hours	Rate	Amount
Alexander D. Wall	39.10	495.00	19,354.50
Keegan Galvin	73.90	112.07	8,282.00
Logan D. Smith	42.70	595.00	25,406.50
Total	155.70		53,043.00

Expenses

Date	Description	Amount
09-04-2024	Delivery services/messengers: FedEx Preliminary Injunction to Corporation Service Company on behalf of Box.com.	31.71
09-30-2024	Online research: PACER	26.40
		Total Expenses
		58.11
		Total for this Invoice
		53,101.11



October 31, 2024

Invoice Period: 10-01-2024 - 10-31-2024

RE: 2158.02 MS

StratFS Receivership

Time Details

Date	Professional	Description	Hours	Rate	Amount
10-01-2024	LDS	Draft complaint against third-party and circulate draft internally; review related materials in support of same.	2.80	595.00	1,666.00
10-01-2024	LDS	Investigate issue re: Texas OCCC outreach and next steps.	0.20	595.00	119.00
10-01-2024	LDS	Correspond with L. Jones re: request for annual report from Texas Office of Consumer Credit Commissioner.	0.10	595.00	59.50
10-01-2024	LDS	Call with L. Jones, T. McNamara, and B. Reiss re: renewal of cyber insurance policy.	0.50	595.00	297.50
10-01-2024	KRG	Review E. Barish (Lucky Marketing) correspondence with R. Sasson for insight into mailer model, identify relevant documents re: same for Mandaree chronology.	1.20	195.00	234.00
10-01-2024	KRG	Continue preparation of Mandaree chronology re: StratFS third-party claims.	2.50	195.00	487.50
10-01-2024	KRG	Organize Ice Legal invoices for L. Smith re: StratFS third-party claims, confer with L. Jones re: same.	0.80	195.00	156.00
10-01-2024	KRG	Organize Ice Legal timekeeping sheets for L. Smith re: StratFS third-party claims.	0.50	195.00	97.50
10-01-2024	KRG	Preserve supplemental informal production re: Blust, test .pst to ensure safe download, load .pst file on T. McNamara's computer for review.	0.60	195.00	117.00
10-01-2024	KRG	Arrange replacement headset for StratFS employee.	0.30	195.00	58.50
10-01-2024	ADW	Review notice of claim from Ohio attorney re: alleged violation of bankruptcy stay by Versara; email to T. McNamara with proposed response.	0.40	495.00	198.00

Date	Professional	Description	Hours	Rate	Amount
10-01-2024	ADW	Review and revise draft complaint re: Ice Legal; continue to review and analyze documents re: Ice Legal's dealings with Strategic.	2.40	495.00	1,188.00
10-02-2024	ADW	Revise draft complaint re: Ice Legal to add language re: counts 1-6 of the complaint; perform legal research re: terms of New York Uniform Voidable Transaction Action and availability of civil conspiracy claims in New York; review and revise entire draft complaint.	5.30	495.00	2,623.50
10-02-2024	KRG	Review Microsoft eDiscovery for Ice Legal correspondence re: final 8 settlements before being retained by StratFS, create spreadsheet detailing agreements, save relevant documents re: same in StratFS third-party claims folder.	1.30	195.00	253.50
10-02-2024	KRG	Search waybackmachine.com for 2020 and 2021 iterations of icelegal.com website.	0.70	195.00	136.50
10-02-2024	KRG	Continue preparation of Mandaree chronology, search Microsoft eDiscovery for gaps in documents, preserving relevant documents re: same.	2.90	195.00	565.50
10-02-2024	LDS	Continue to draft and revise complaint against third-party.	3.60	595.00	2,142.00
10-03-2024	LDS	Review complaint against Monevo drafted by A. Wall.	0.30	595.00	178.50
10-03-2024	LDS	Participate in team meeting re: update on potential third-party claims.	0.80	595.00	476.00
10-03-2024	KRG	Meet with attorney team re: StratFS third-party claims.	0.80	195.00	156.00
10-03-2024	KRG	Continue preparation of Mandaree chronology, search Microsoft eDiscovery for gaps in documents, preserving relevant documents re: same.	3.00	195.00	585.00
10-03-2024	KRG	Conduct research re: Ice Legal and circulate same to L. Smith, A. Wall, and T. McNamara re: third-party claim.	0.50	195.00	97.50
10-03-2024	KRG	Confer with L. Jones re: Strategic Dreams yacht and Strategic airplane, find documents re: same.	0.40	195.00	78.00
10-03-2024	ADW	Continue revising and re-writing complaint re: Ice Legal.	2.00	495.00	990.00
10-03-2024	ADW	Meet with Receiver's team re: investigation and preparation of third-party claims, and related matters.	0.80	495.00	396.00
10-03-2024	ADW	Email to M. Vu of Box.com, responding to	0.60	495.00	297.00

Date	Professional	Description	Hours	Rate	Amount
		correspondence re: identification, freezing of, and access to Box.com data rooms for Receivership Defendants.			
10-03-2024	ADW	Review correspondence from K. Mack re: threatened adversary proceeding by Versara borrower; email to K. Mack acknowledging correspondence and advising of preliminary injunction, receivership, and stay of actions.	0.70	495.00	346.50
10-03-2024	ADW	Email to T. McNamara and L. Smith re: elements of proving contempt by Intervenor Law Firms and burdens of proof, in preparation for upcoming hearing re: Receiver's motion for Order to Show Cause re: contempt.	0.50	495.00	247.50
10-03-2024	ADW	Review and revise complaint re: Monevo.	0.70	495.00	346.50
10-03-2024	ADW	Confer with K. Galvin re: ability to access Box.com accounts and data rooms; email to M. Vu of Box.com responding to inquiry re: access to accounts.	0.20	495.00	99.00
10-04-2024	ADW	Revise complaint re: Monevo, in light of comments and suggestions from L. Smith; confer with L. Smith re: arbitration provision; call with J. Thoman re: pre-filing review; email draft complaint to J. Thoman for final review and comments.	1.00	495.00	495.00
10-04-2024	KRG	Confer with A. Wall re: potential of Mandaree as a receivership/relief defendant and progress of Mandaree chronology.	0.20	195.00	39.00
10-04-2024	KRG	Search for emails of StratFS team sending invoices to Monevo in Microsoft eDiscovery platform.	0.80	195.00	156.00
10-04-2024	KRG	Complete draft of Mandaree chronology, send same to A. Wall for edits.	3.50	195.00	682.50
10-04-2024	LDS	Review and revise complaint against Monevo and send related email.	1.20	595.00	714.00
10-04-2024	LDS	Review and draft email to third-party attaching complaint and making demand; confer internally re: same; review underlying documents of third-party.	2.20	595.00	1,309.00
10-07-2024	KRG	Pull Monevo and StratFS correspondence re: invoices, confer with A. Wall re: same.	1.30	195.00	253.50
10-07-2024	KRG	Begin drafting memorandum in support of chronology re: Mandaree.	4.50	195.00	877.50
10-07-2024	KRG	Confer with A. Wall re: Mandaree memo organization.	0.20	195.00	39.00

Date	Professional	Description	Hours	Rate	Amount
10-07-2024	ADW	Review and annotate memorandum re: key Mandaree documents and chronology of events.	0.80	495.00	396.00
10-07-2024	ADW	Review and revise complaint re: Ice Legal.	2.40	495.00	1,188.00
10-08-2024	ADW	Continue reviewing and revising complaint re: Ice Legal.	1.20	495.00	594.00
10-08-2024	ADW	Draft agenda for meeting of Receiver's team re: potential third-party claims and related matters.	0.20	495.00	99.00
10-08-2024	ADW	Meet with Receiver's team re: third-party claims and related matters.	0.40	495.00	198.00
10-08-2024	ADW	Revise complaint re: Monevo per discussion with T. McNamara.	0.40	495.00	198.00
10-08-2024	KRG	Continue drafting Mandaree chronology memorandum.	3.80	195.00	741.00
10-08-2024	KRG	Search Microsoft eDiscovery for more correspondence re: Pentius/Array contract, update fact chronology re: same.	0.40	195.00	78.00
10-08-2024	KRG	Meet with attorney team re: StratFS third-party claims.	0.40	195.00	78.00
10-08-2024	KRG	Confer with A. Wall re: research and provide invoice emails to bolster Monevo complaint.	0.30	195.00	58.50
10-08-2024	LDS	Participate in team meeting re: update on potential third-party claims.	0.40	595.00	238.00
10-08-2024	LDS	Continue to review and revise complaint re: third-party and send internal emails re: same.	1.20	595.00	714.00
10-09-2024	LDS	Review lawsuit against Law Firms filed by notaries in Western District of New York and circulate.	0.30	595.00	178.50
10-09-2024	LDS	Review request from Plaintiffs re: materials and confer internally re: same.	0.40	595.00	238.00
10-09-2024	LDS	Confer with counsel for third-party re: lawsuit brought against Law Firms and send related email re: same; conduct online research and PACER research re: claims against third-party; send emails re: same.	0.80	595.00	476.00
10-09-2024	KRG	Confer with A. Wall re: internet archives preservation of sites re: third-party claim against Ice Legal, research methods of preservation and email internet archives.	0.70	195.00	136.50
10-09-2024	KRG	Review invoices and create chronology to track hours worked and hourly rate for Ice Legal personnel.	1.00	195.00	195.00

Date	Professional	Description	Hours	Rate	Amount
10-09-2024	KRG	Send enrollment documents to K. Godios re: StratFS rehire employee.	0.20	195.00	39.00
10-09-2024	KRG	Review potential methods to download websites for preservation purposes on internet archives.	0.80	195.00	156.00
10-09-2024	ADW	Per Court's order re: Fidelis' document production, review Fidelis' document productions, collect files and set up download link; email to L. Smith to confirm production.	0.40	495.00	198.00
10-10-2024	ADW	Confer with L. Jones re: ongoing investigation of large and suspicious transfers from Strategic entities to third parties.	0.30	495.00	148.50
10-10-2024	ADW	Perform legal research re: use of attorney violations of bar rules as evidence of legal malpractice or breach of fiduciary duty.	1.00	495.00	495.00
10-10-2024	ADW	Review, revise, and proofread entire complaint re: Ice Legal, making final edits and revisions.	1.70	495.00	841.50
10-10-2024	KRG	Correspond with S. Carey (Buffalo computer recycling) re: additional invoice.	0.10	195.00	19.50
10-10-2024	KRG	Confer with L. Jones re: payment of additional invoice for Buffalo computer recycling.	0.20	195.00	39.00
10-10-2024	KRG	Confer with A. Wall re: legal theory behind StratFS outsourcing contracts to Mandaree.	0.20	195.00	39.00
10-10-2024	KRG	Correspond with CFPB re: sending Fidelis productions, .zip Fidelis file for extranet secure file transfer, follow up with Receiver re: same.	0.40	195.00	78.00
10-10-2024	ADW	Meeting with T. McNamara, L. Jones, L. Smith, and K. Galvin re: third-party claims.	0.70	495.00	346.50
10-10-2024	KRG	Meeting with T. McNamara, L. Jones, L. Smith, and A. Wall re: third-party claims.	0.70	195.00	136.50
10-10-2024	LDS	Participate in team meeting re: third-party claims.	0.70	595.00	416.50
10-10-2024	LDS	Continue to prepare draft complaint, review supporting materials, and send related emails re: same.	2.80	595.00	1,666.00
10-11-2024	KRG	Confer with L. Jones re: Buffalo Computer Recycling additional invoice, email B. Reiss re: same.	0.10	195.00	19.50
10-11-2024	ADW	Revise complaint re: Monevo and perform final pre-filing review and editing; revise and finalize Civil Action Cover Sheet; draft Notice of Related Case and finalize for filing; draft Certification and Notice of Interested Parties and finalize for filing; review	2.10	495.00	1,039.50

Date	Professional	Description	Hours	Rate	Amount
		and finalize exhibits to complaint.			
10-11-2024	ADW	Draft summons re: Monevo Inc.; coordinate with staff to open ancillary action on PACER and file all documents; email to J. Thoman's office re: filings and need for pro hac vice applications.	1.40	495.00	693.00
10-11-2024	ADW	Review and revise memorandum from K. Galvin re: Mandaree-related chronology.	1.10	495.00	544.50
10-15-2024	KRG	Order replacement laptops for StratFS employees.	0.30	195.00	58.50
10-15-2024	KRG	Correspond with H. Quanitez re: quality control progress update on ARM export of Relativity database.	0.10	195.00	19.50
10-15-2024	KRG	Review A. Wall comments on Mandaree memo, make edits re: same.	2.10	195.00	409.50
10-15-2024	KRG	Draft letters for COBRA-eligible employees.	1.00	195.00	195.00
10-15-2024	KRG	Call with B. Reiss re: vendor roles in mailer model re: Mandaree.	0.80	195.00	156.00
10-15-2024	KRG	Cull exhibits for Ice Legal complaint, review exhibits for accuracy, add cover pages re: same.	2.00	195.00	390.00
10-15-2024	KRG	Meet with attorney team re: StratFS third-party claims.	0.80	195.00	156.00
10-15-2024	LDS	Confer with J. O'Donnell re: Versara and loan portfolio and review related materials.	0.30	595.00	178.50
10-15-2024	LDS	Finalize complaint against third-party and email with demand supporting same.	1.20	595.00	714.00
10-15-2024	ADW	Review District Court's ADR Plan and requirements re: Monevo action.	0.20	495.00	99.00
10-15-2024	ADW	Review and revise complaint re: Ice Legal, including corrections to party identification, changes to fiduciary duty claims, and final pre-service proofing.	1.20	495.00	594.00
10-15-2024	ADW	Review complete package of documents to be served to Monevo with summons and complaint.	0.10	495.00	49.50
10-15-2024	ADW	Meet with Receiver's team re: potential third-party claims, Monevo and Ice Legal litigation, and related matters.	0.80	495.00	396.00
10-15-2024	ADW	Perform legal research re: impact of public policy violation in legal retainer on malpractice insurance coverage.	0.50	495.00	247.50
10-15-2024	ADW	Research timetable for initial disclosures, Rule	0.40	495.00	198.00

Date	Professional	Description	Hours	Rate	Amount
		26(f) conference, mandatory ADR conferral, and Rule 16 Pretrial Conference in Western District of New York, re: Monevo action.			
10-16-2024	ADW	Revise complaint re: Ice Legal to make final corrections and edits, re-order causes of action; prepare confidential draft PDF copy of complaint with Exhibits A-D.	0.80	495.00	396.00
10-16-2024	ADW	Review and analyze Vcorp account to determine outstanding and upcoming fees due to Vcorp for registered agent services for Atlas and Timberline; email to T. McNamara and L. Smith with list of recommended invoices for payment.	1.10	495.00	544.50
10-16-2024	ADW	Email to C. Ball re: outstanding and upcoming Vcorp invoices for Atlas and Timberline.	0.20	495.00	99.00
10-16-2024	ADW	Review and complete documents for admission Pro Hac Vice re: Monevo action, including Petition for Admission, Attorney Oath, Civility Principles, Notice of Motion, and Declaration.	0.40	495.00	198.00
10-16-2024	ADW	Draft stipulation and order resolving emergency motion for order to show cause re: holding Law Firms in contempt.	1.80	495.00	891.00
10-16-2024	ADW	Review correspondence in preparation for call with Box.com representatives; call with D. Chen and M. Vu of Box.com re: Receiver's requests for documents and information.	0.70	495.00	346.50
10-16-2024	ADW	Confer with L. Smith re: Stipulation and Order re: Law Firms' contempt, to discuss violations of Preliminary Injunction; revise Stipulation and Order to add sections re: violations of Preliminary Injunction and Law Firms' agreement to comply with specific provisions of same.	1.20	495.00	594.00
10-16-2024	LDS	Finalize complaint against third-party and email with demand supporting same.	0.80	595.00	476.00
10-16-2024	LDS	Confer with counsel for CFPB and review related documents re: assets.	0.60	595.00	357.00
10-16-2024	LDS	Confer with T. McNamara and counsel for ESOP re: status.	0.40	595.00	238.00
10-16-2024	LDS	Confer with counsel for third-party re: inquiry on Receiver's position on Law Firms and review related materials	0.40	595.00	238.00
10-16-2024	KRG	Confer with A. Wall re: fact chronology and memorandum re: Mandaree, and strategy for upcoming call with CFPB re: asset list.	0.20	195.00	39.00
10-16-2024	KRG	Finalize memorandum and fact chronology re: Mandaree, circulate to attorney team.	2.10	195.00	409.50

Date	Professional	Description	Hours	Rate	Amount
10-16-2024	KRG	Call with A. Wall and Box.com general counsel re: access to data rooms, confer with A. Wall re: same.	0.60	195.00	117.00
10-16-2024	KRG	Correspond with B. Reiss re: customer support ticket with Box.com re: three missing Box.com folders.	0.10	195.00	19.50
10-16-2024	KRG	Prepare for call with Box.com general counsel.	0.20	195.00	39.00
10-17-2024	KRG	Correspond with B. Reiss re: Datasuite and DMG and their role in the StratFS marketing meetings.	0.10	195.00	19.50
10-17-2024	KRG	Confer with A. Wall re: response to Box.com re: deleted data room folders.	0.20	195.00	39.00
10-17-2024	KRG	Draft email to M. Vu and D. Chen re: follow up from call with Box.com and request for information re: deleted folders.	0.40	195.00	78.00
10-17-2024	KRG	Prepare for meeting with CFPB re: asset list.	0.60	195.00	117.00
10-17-2024	KRG	Meet with CFPB, L. Smith, A. Wall, L. Jones, T. McNamara re: assets.	0.80	195.00	156.00
10-17-2024	KRG	Meet with StratFS team re: third-party claims.	0.50	195.00	97.50
10-17-2024	KRG	Confer with L. Jones re: meeting re: LLC's and asset search for Mandaree.	0.20	195.00	39.00
10-17-2024	KRG	Confer with A. Wall re: methodology for asset search re: Mandaree.	0.20	195.00	39.00
10-17-2024	KRG	Conduct preliminary asset search re: Mandaree, report findings to attorney team.	1.30	195.00	253.50
10-17-2024	LDS	Prepare for and participate in call re: insurance-related matters with J. Thoman and R. Cummings of Hodgson Russ and Receiver.	0.50	595.00	297.50
10-17-2024	LDS	Confer with team at CFPB re: existing list of frozen assets, additional asset searching, and review related materials.	0.80	595.00	476.00
10-17-2024	LDS	Draft stipulation re: Law Firms' contempt and review materials on docket.	1.80	595.00	1,071.00
10-17-2024	LDS	Participate in team meeting with Receiver re: third-party claims and related issues.	0.50	595.00	297.50
10-17-2024	ADW	Confer with team at CFPB re: existing list of frozen assets, additional asset searching, and review related materials.	0.80	495.00	396.00

Date	Professional	Description	Hours	Rate	Amount
10-17-2024	ADW	Videoconference with T. McNamara, L. Smith, J. Thoman, and R. Cummings re: insurance-related matters.	0.50	495.00	247.50
10-17-2024	ADW	Draft agenda for meeting of Receiver's team re: potential and ongoing third-party claims and related matters.	0.30	495.00	148.50
10-17-2024	ADW	Review and analyze Receiver's Further Request for Instruction and proposed Order re: Further Request for Instruction, and strategize and consider potential stipulation re: Further Request for Instruction.	0.40	495.00	198.00
10-17-2024	ADW	Meet with Receiver's team re: potential and ongoing third-party claims, insurance-related matters, asset searching, and related issues.	0.50	495.00	247.50
10-17-2024	ADW	Review and revise Stipulation and Order re: Law Firms' contempt; review Declarations of T. Connors and Law Firms' communications vendor and add information to stipulation re: how Law Firms' contempt was remedied; email to Receiver for review.	1.30	495.00	643.50
10-17-2024	ADW	Confer multiple times with K. Galvin re: Mandaree entities' public government contracts and amounts awarded.	0.50	495.00	247.50
10-17-2024	ADW	Confer with L. Jones re: recently-identified transactions involving disbursements of KeyBank loan proceeds to ESOP sellers.	0.20	495.00	99.00
10-18-2024	LDS	Investigate third-party claims and ESOP transaction and confer with L. Jones and C. Ball re: same; review supporting information.	0.80	595.00	476.00
10-21-2024	LDS	Attend team meeting re: third-party claims, asset tracing, and related issues; review related materials.	0.80	595.00	476.00
10-21-2024	LDS	Investigate third-party claims, asset tracing, and review materials from QuickBooks and internal documents re: same.	0.60	595.00	357.00
10-21-2024	ADW	Review and revise email to counsel for Box.com re: preservation of data accounts/folders and request for information re: deletion of data.	0.30	495.00	148.50
10-21-2024	ADW	Draft agenda for meeting of Receiver's team re: third-party claims and investigations; confer with K. Galvin re: ongoing asset tracing.	0.50	495.00	247.50
10-21-2024	ADW	Meet with Receiver's team re: third-party claims and related matters, including extensive discussion of asset tracing efforts and findings so far.	0.80	495.00	396.00

Date	Professional	Description	Hours	Rate	Amount
10-21-2024	ADW	Review all briefing regarding Receiver's Request for Further Instruction and draft proposed Stipulation and Order re: Receiver's Request for Further Instruction.	3.30	495.00	1,633.50
10-21-2024	ADW	Confer internally re: response to consumer's inquiry re: instituting private action against Strategic.	0.10	495.00	49.50
10-21-2024	KRG	Search Microsoft eDiscovery Platform for documents related to defendant's LLC, continue build-out of summary document re: same.	3.50	195.00	682.50
10-21-2024	KRG	Review A. Wall's edits to Box.com email reply, make further edits and send reply to Box.com re: same.	0.20	195.00	39.00
10-21-2024	KRG	Review Stipulation and Order re: asset freeze related to Birds and Timberline 1042 in preparation for third-party claims meeting.	0.30	195.00	58.50
10-21-2024	KRG	Prepare relevant documents to be shown at third-party claims meeting.	0.30	195.00	58.50
10-21-2024	KRG	Meet with attorney team re: StratFS third-party claims.	0.80	195.00	156.00
10-21-2024	KRG	Confer with A. Wall re: next steps for asset/LLC tracking.	0.30	195.00	58.50
10-21-2024	KRG	Confer multiple times with L. Jones re: asset tracking and responding to payroll inquiries.	0.30	195.00	58.50
10-21-2024	KRG	Review and respond to payroll inquiries re: Canyon Legal Group, Boulder Law, and Anchor Law Firm.	0.20	195.00	39.00
10-22-2024	KRG	Confer with L. Jones re: bank accounts related to defendants and CFPB.	0.20	195.00	39.00
10-22-2024	KRG	Confer with A. Wall re: bank information for Timberline universe, future tasks in potential third-party claims tasks.	0.20	195.00	39.00
10-22-2024	ADW	Review dockets and relevant pleadings in Briggs Action, City of Chicago Action, and Rufty matters; draft summary of Briggs and City of Chicago Actions and current status and timeline of CFPB Action, for reference by independent ESOP appraiser.	4.00	495.00	1,980.00
10-22-2024	ADW	Meet with team to discuss chronology necessary for ESOP valuation opinion; describe contents and deliverables.	0.30	495.00	148.50
10-22-2024	LDS	Meet with team to discuss ESOP.	0.30	595.00	178.50

Date	Professional	Description	Hours	Rate	Amount
10-22-2024	KRG	Meet with team to discuss chronology necessary for ESOP valuation opinion; describe contents and deliverables.	0.30	195.00	58.50
10-23-2024	LDS	Conduct fact research re: Versara and review emails re: same.	0.30	595.00	178.50
10-23-2024	ADW	Continue drafting summary and timeline of Briggs, City of Chicago, and CFPB Actions per request of ESOP valuator.	2.30	495.00	1,138.50
10-23-2024	ADW	Review proposed language and GoDaddy's proposed order re: transfer of website domains to Receiver, and draft proposed language for FTC.	0.50	495.00	247.50
10-23-2024	ADW	Review general inquiries from consumers; confer internally and provide direction for responding to consumer inquiries re: recovery of funds.	0.40	495.00	198.00
10-23-2024	ADW	Review Monarch Legal's response to Supplemental Brief re: motion to compel production in City of Chicago v. Strategic matter.	0.30	495.00	148.50
10-23-2024	ADW	Review and analyze memorandum from Mercadien CPAs re: receivership estate assets and transfers, with particular focus on transfers to Birds entities and payments to Mandaree-related entities.	0.80	495.00	396.00
10-23-2024	KRG	Continue analysis of Mandaree assets, review USA Spending.gov and highergov.com re: federal contracts awarded to MEC business, analyze outlayed amount to business, reviewing midi website re: employment information, draft report re: same, circulate via email to attorney team.	3.10	195.00	604.50
10-23-2024	KRG	Confer with L. Jones re: outlay vs obligated amount for USA federal spending.	0.20	195.00	39.00
10-23-2024	KRG	Review Mercadien email re: StratFS accounting review.	0.40	195.00	78.00
10-24-2024	KRG	Confer with L. Jones re: tracing of funds for 2 East Drive Sag Harbor property.	0.20	195.00	39.00
10-24-2024	KRG	Search Microsoft eDiscovery for 2 East Drive Sag Harbor property, preserve relevant documents.	1.40	195.00	273.00
10-24-2024	KRG	Create new search in Microsoft eDiscovery platform re: Duke Enterprises, Jax Investments, and Axel Development.	0.30	195.00	58.50
10-24-2024	KRG	Search Microsoft eDiscovery platform for "DCGT" unknown ESOP disbursement from 2020 in accordance with Mercadian report.	0.40	195.00	78.00
10-24-2024	KRG	Meet with attorney team re: StratFS third-party	0.70	195.00	136.50

Date	Professional	Description	Hours	Rate	Amount
		claims.			
10-24-2024	KRG	Call with L. Jones and A. Wall re: CIBC and Birds Investment and chronology/letter re: same.	0.30	195.00	58.50
10-24-2024	KRG	Create review set re: CIBC.	0.30	195.00	58.50
10-24-2024	KRG	Confer with A. Wall re: CIBC and KeyBank loan.	0.20	195.00	39.00
10-24-2024	KRG	Begin review of CIBC/KeyBank correspondence, saving relevant documents for chronology.	1.40	195.00	273.00
10-24-2024	ADW	Meet with Receiver's team re: third-party claims and investigations, including issues relating to asset tracing and recent forensic accounting report of Mercadien.	0.70	495.00	346.50
10-24-2024	ADW	Call with L. Jones and K. Galvin re: mortgage and tax issues relating to Birds investment properties.	0.30	495.00	148.50
10-24-2024	ADW	Revise summaries of Briggs Action, City of Chicago Action, and CFPB Action into narrative form re: ESOP valuation report; perform further review of docket and pleadings in City of Chicago Action, particularly various motions to dismiss filed, arguments raised, and results of the motions, for discussion in narrative summary.	1.70	495.00	841.50
10-24-2024	ADW	Review bank transaction analyses and Mercadien report re: Birds Investments and Birds Financial, and begin drafting memorandum re: Receivership Defendants.	1.30	495.00	643.50
10-24-2024	LDS	Review issues re: Versara Lending Services; review related email and send responsive email re: same.	0.30	595.00	178.50
10-24-2024	LDS	Meet with Receiver's team re: asset tracing and third-party claims.	0.70	595.00	416.50
10-25-2024	ADW	Continue review of Birds-related documents re: Birds Financial as Receivership Defendant.	2.40	495.00	1,188.00
10-25-2024	ADW	Review and respond to consumer emails re: employee ESOP claims and status of Versara Lending loans.	1.20	495.00	594.00
10-25-2024	KRG	Continue review of StratFS internal documents re: CIBC and save relevant documents re: same for chronology.	1.30	195.00	253.50
10-25-2024	KRG	Update chronology in Microsoft eDiscovery platform.	1.50	195.00	292.50
10-25-2024	KRG	Begin drafting chronology re: CIBC, confer with A. Wall and L. Jones re: April 30th agreement.	1.70	195.00	331.50

Date	Professional	Description	Hours	Rate	Amount
10-28-2024	KRG	Continue review of CIBC-related correspondence, identify documents related to October 31 Second Amended Agreement, incorporate same into chronology.	4.30	195.00	838.50
10-28-2024	KRG	Confer multiple times with A. Wall re: flow of funds and chronology re: CIBC loans.	0.30	195.00	58.50
10-28-2024	KRG	Continue review of CIBC-related documents, identify documents related to 2020 reorganization loan for CIBC, and save relevant documents.	1.40	195.00	273.00
10-28-2024	ADW	Continue drafting memorandum re: Birds Investments and Birds Financial; research Birds Group, LLC.	2.00	495.00	990.00
10-28-2024	ADW	Confer internally re: status of Regus virtual offices used by Versara; email to T. McNamara, J. Thoman et al. re: confirming closure of all Regus offices; email creditor claim form to R. Meissler, collection agent for Regus, with instruction to complete and return form.	0.50	495.00	247.50
10-29-2024	ADW	Revise summary of CFPB, Briggs, and City of Chicago civil actions for review by D. Burdette re: ESOP valuation, and email summaries to D. Burdette.	0.40	495.00	198.00
10-29-2024	LDS	Consider potential arguments re: receivership for hearing and send related email to T. McNamara re: same.	0.40	595.00	238.00
10-29-2024	KRG	Continue to date documents for CIBC loan chronology; confer with A. Wall re: same.	3.50	195.00	682.50
10-29-2024	KRG	Confer with A. Wall re: memorandum to accompany chronology re: CIBC and hearing re: Order to Show Cause and Request for Instruction.	0.20	195.00	39.00
10-30-2024	KRG	Finalize chronology re: CIBC loans.	2.10	195.00	409.50
10-30-2024	KRG	Draft memorandum to accompany chronology re: CIBC loans.	2.70	195.00	526.50
10-30-2024	KRG	Research CSG and ESOP sales processes, compare research to StratFS facts, conduct additional research re: lawsuits regarding ESOP transactions.	1.10	195.00	214.50
10-30-2024	LDS	Review letter from third-party re: requested extension of time and consider request.	0.20	595.00	119.00
10-30-2024	ADW	Confer with K. Galvin multiple times re: review of Strategic ESOP transaction and subsequent financing and flow of funds to ESOP sellers; perform research and review and annotate important documents from recent lawsuits against ESOP sellers and trustees, and consider potential	1.10	495.00	544.50

Date	Professional	Description	Hours	Rate	Amount
		claims and liability issues relating to Strategic ESOP.			
10-30-2024	ADW	Review and analyze Defendants' Renewed Motion to Modify Preliminary Injunction and Challenging Receiver's Determination, supporting Memorandum, supporting Declaration of D. Vacco, and related exhibits and filings; begin drafting Opposition to Defendants' Motion.	3.80	495.00	1,881.00
10-31-2024	ADW	Continue drafting Opposition to Defendants' Motion to Modify Preliminary Injunction and Challenging Receiver's Determination.	4.10	495.00	2,029.50
10-31-2024	LDS	Review emails re: potential claim against third-party and send internal emails re: same.	0.30	595.00	178.50
10-31-2024	LDS	Confer with counsel for third-party re: claims and extension; review potential next steps and send related email.	0.30	595.00	178.50
10-31-2024	ADW	Meeting with L. Jones, L. Smith, T. McNamara, and K. Galvin re: status of third party claims.	0.50	495.00	247.50
10-31-2024	KRG	Meeting with L. Jones, L. Smith, T. McNamara, and A. Wall re: status of third party claims.	0.50	195.00	97.50
10-31-2024	LDS	Meeting with L. Jones, T. McNamara, K. Galvin and A. Wall re: status of third party claims.	0.50	595.00	297.50
10-31-2024	KRG	Finalize and circulate memorandum and chronology re: CIBC loan.	0.40	195.00	78.00
10-31-2024	KRG	Review emails response from Box.com re: data room folders and accounts, send redline draft replies to A. Wall re: same.	0.40	195.00	78.00
10-31-2024	KRG	Export initial batch of final reports in DebtPayPro for L. Jones, confer with R. Anderlick re: wind down.	0.80	195.00	156.00
			Total	194.90	73,305.50

Time Summary

Professional	Hours	Rate	Amount
Alexander D. Wall	76.20	495.00	37,719.00
Keegan Galvin	87.60	195.00	17,082.00
Logan D. Smith	31.10	595.00	18,504.50
Total	194.90		73,305.50

Expenses

Date	Description	Amount
10-11-2024	Court Fee: Filing Fee re: Monevo Complaint	405.00
10-15-2024	Delivery services/messengers: Service of process re: summons, complaint, and related court filings on Monevo, Inc.	269.85

Date	Description	Amount
	Total Expenses	674.85
	Total for this Invoice	73,980.35



November 30, 2024

Invoice Period: 11-01-2024 - 11-30-2024

RE: 2158.02 MS

StratFS Receivership

Time Details

Date	Professional	Description	Hours	Rate	Amount
11-01-2024	KRG	Confer with A. Wall re: Birds Investments' capitalization origins.	0.40	195.00	78.00
11-01-2024	KRG	Search Microsoft eDiscovery platform re: loans to fund Birds Investments Inc., preserve relevant documents re: same.	2.50	195.00	487.50
11-01-2024	KRG	Meet with attorney team re: StratFS third-party claims.	0.90	195.00	175.50
11-01-2024	LDS	Evaluate claims against Monevo and review variety of related emails and materials, including investigating interest in breach of contract action; confer with counsel for Monevo re: requested extension; confer internally re: same.	2.20	595.00	1,309.00
11-01-2024	LDS	Investigate third-party claims and review related email with counsel.	0.80	595.00	476.00
11-01-2024	ADW	Confer internally re: Monevo's request for extension of time to respond to complaint and proposed mediation; calculate potential pre-judgment interest and per diem rate per request of L. Smith.	0.50	495.00	247.50
11-01-2024	ADW	Correspond with M. Vu of Box.com re: preservation of accounts, access to account folders, and potential deletions.	0.30	495.00	148.50
11-01-2024	ADW	Meet with Receiver's team re: potential third-party claims, Monevo litigation, status of Ice Legal claims, review of research re: loans and ESOP transaction, status of Receiver's request for further instruction, and related matters.	0.90	495.00	445.50
11-01-2024	ADW	Continue drafting Opposition to Defendants' Motion to Modify Preliminary Injunction and Challenging Receiver's Determination.	1.70	495.00	841.50
11-01-2024	ADW	Research process for surrendering lender license in Indiana; email to B. Ball of Indiana Department	0.50	495.00	247.50

Date	Professional	Description	Hours	Rate	Amount
		of Financial Institutions re: requesting form for surrendering license.			
11-01-2024	LDS	Meet with receivership team re: StratFS third-party claims and other pending matters.	0.90	595.00	535.50
11-01-2024	ADW	Confer with K. Galvin re: Birds Investments' capitalization origins.	0.40	495.00	198.00
11-04-2024	ADW	Meet with Receiver's team re: third-party claims and related matters.	0.50	495.00	247.50
11-04-2024	LDS	Participate in team meeting re: third-party claims and related issues.	0.50	595.00	297.50
11-04-2024	LDS	Review issue re: request for information from Plaintiffs re: Lit Def and questions of privilege.	0.30	595.00	178.50
11-04-2024	LDS	Review and send emails with counsel for Monevo re: initial discussions.	0.20	595.00	119.00
11-04-2024	KRG	Attend StratFS meeting with attorneys re: third-party claims.	0.50	195.00	97.50
11-04-2024	KRG	Confer with A. Wall re: search for privileged information in Lit Def email inboxes, load Hinds and Saavedra .pst inboxes re: same.	0.30	195.00	58.50
11-04-2024	KRG	Review changes in invoices for Ankura re: StratFS electronic data and wind down of Relativity use.	0.20	195.00	39.00
11-05-2024	KRG	Confer with A. Wall re: Box.com email asking for a customer service inquiry re: folder deletions; correspond with B. Reiss re: request to Box.com customer service re: same.	0.20	195.00	39.00
11-05-2024	KRG	Review M. Hinds' .pst file re: privileged and confidential information, draft analysis re: same, confer with A. Wall re: same, and circulate analysis and attachments to L. Smith and T. McNamara.	1.10	195.00	214.50
11-05-2024	LDS	Review email from B. Reiss and issues re: loan adjustment process.	0.30	595.00	178.50
11-05-2024	LDS	Draft opposition to renewed motion to modify PI re: new Receivership Defendants and circulate same.	1.00	595.00	595.00
11-05-2024	ADW	Continue drafting Opposition to Strategic Defendants' Motion to Modify PI and Challenging Receiver's Determination.	3.80	495.00	1,881.00
11-06-2024	ADW	Continue revising Opposition to Strategic's Motion to Modify Preliminary Injunction and Challenging Receiver's Determination, through multiple rounds of revision.	1.40	495.00	693.00

Date	Professional	Description	Hours	Rate	Amount
11-06-2024	LDS	Review CFPB's filing and consider potential implications for receivership estate; discuss with T. McNamara.	1.50	595.00	892.50
11-06-2024	LDS	Review draft Opposition brief to Motion to Modify PI and evaluate edits of client.	0.50	595.00	297.50
11-06-2024	LDS	Evaluate potential third-party claims and review underlying materials.	0.70	595.00	416.50
11-07-2024	LDS	Review latest version of Opposition to Motion to Modify PI and make edits thereto; confer internally re: same.	1.30	595.00	773.50
11-07-2024	LDS	Review emails re: withdrawal of Intervenor Law Firms and internal logistics of same; review proposed materials to be provided to consumers and related discussions of same; confer with client re: same.	0.50	595.00	297.50
11-07-2024	LDS	Participate in update meeting with team re: third-party claims and related issues.	0.70	595.00	416.50
11-07-2024	LDS	Review emails re: capital call and Fortress.	0.20	595.00	119.00
11-07-2024	KRG	Continue drafting Defendants' additional LLC's ownership chart using Microsoft eDiscovery Platform and documents preserved from StratFS site, confer multiple times with A. Wall and L. Jones re: same.	2.30	195.00	448.50
11-07-2024	KRG	Meet with attorney team re: third-party claims and related matters.	0.70	195.00	136.50
11-07-2024	KRG	Confer with L. Jones re: need to send COBRA invoices to StratFS employees.	0.20	195.00	39.00
11-07-2024	KRG	Continue analysis of Timberline LLC's ownership structures and investments.	1.60	195.00	312.00
11-07-2024	ADW	Meeting of Receiver's team re: third-party claims and related matters.	0.70	495.00	346.50
11-07-2024	ADW	Email exchange with C. Ball re: state-by-state registration compliance audit for Versara, Atlas, and Timberline.	0.40	495.00	198.00
11-07-2024	ADW	Confer with L. Smith re: Opposition to Strategic Defendants' Motion to Modify Injunction; revise Opposition to Strategic Defendants' Motion to Modify Injunction; email to L. Smith for review and consideration.	1.80	495.00	891.00
11-08-2024	ADW	Confer with L. Smith and L. Jones re: claims against Monevo and calculation of pre-judgment interest.	0.50	495.00	247.50

Date	Professional	Description	Hours	Rate	Amount
11-08-2024	ADW	Draft letter to Mandaree Enterprises re: notice of audit; email to Receiver for review and comment.	2.80	495.00	1,386.00
11-08-2024	LDS	Confer with A. Wall and L. Jones re: claims against Monevo and calculation of pre-judgment interest.	0.50	595.00	297.50
11-08-2024	KRG	Monitor receivership inbox and update ADP with necessary employee updates accordingly.	0.30	195.00	58.50
11-08-2024	KRG	Continue drafting Timberline LLC ownership and investments sheet.	0.80	195.00	156.00
11-08-2024	KRG	Begin review of Birds LLC's ownership, begin drafting ownership and investments sheet re: same.	1.10	195.00	214.50
11-08-2024	KRG	Continue to search Microsoft eDiscovery for information on non-1042 real property and similarly named LLC's, as well as additional 1042 properties.	4.30	195.00	838.50
11-08-2024	KRG	Review complaint against CSG by StratFS Defendants re: 1042 properties; confer with L. Jones and A. Wall re: same.	0.50	195.00	97.50
11-08-2024	LDS	Evaluate potential next steps re: Monevo and send follow-up email re: same internally.	0.50	595.00	297.50
11-11-2024	LDS	Confer with B. Reiss and J. O'Donnell re: update.	0.60	595.00	357.00
11-11-2024	LDS	Revise and circulate edited opposition brief re: Renewed Motion to Modify PI; send related emails.	0.70	595.00	416.50
11-11-2024	LDS	Review terms of Preliminary Injunction and consider facts re: Versara and related entities.	0.50	595.00	297.50
11-11-2024	LDS	Review issues re: withdrawal of Intervenor Law Firms and confer internally re: same.	0.30	595.00	178.50
11-11-2024	LDS	Meet with team re: update on third-party claims and review related materials.	0.50	595.00	297.50
11-11-2024	KRG	Cull documents from Microsoft eDiscovery platform re: real property purchased with funds from ESOP sale, continue write-up re: same in anticipation of third-party claims meeting.	2.60	195.00	507.00
11-11-2024	KRG	Organize LLC folder in server with recently identified documents re: real property purchased by defendants and other miscellaneous investments.	0.50	195.00	97.50
11-11-2024	KRG	Prepare for StratFS third-party claims meeting.	0.40	195.00	78.00

Date	Professional	Description	Hours	Rate	Amount
11-11-2024	KRG	Meet with attorney team re: StratFS third-party claims.	0.50	195.00	97.50
11-11-2024	KRG	Continue to draft real property spreadsheet, conduct Microsoft eDiscovery searches re: Claudio's ownership structure, potential sale of 32 Laurel property, and identify completed sales on real property list.	2.60	195.00	507.00
11-11-2024	ADW	Meet with Receiver's team re: third-party claims, asset tracing, and related issues.	0.50	495.00	247.50
11-11-2024	ADW	Revise notice of audit to Mandaree Enterprises; email letter to F. Pina for review and comments; email exchange with F. Pina re: content of audit letter.	0.90	495.00	445.50
11-12-2024	ADW	Review pre-judgment interest calculation and discuss with L. Jones.	0.30	495.00	148.50
11-12-2024	ADW	Review Strategic's invoices to Monevo 2021-23; confer with L. Smith re: pre-judgment interest; emails to C. Ball re: question regarding reconciled invoice amounts; assemble invoices, draft email to Monevo's counsel with invoices; review email from A. Sheraz, Chief Legal Officer of Monevo, and confer with Receiver re: response.	1.80	495.00	891.00
11-12-2024	ADW	Perform multiple rounds of revisions of Opposition to Strategic's Motion to Modify Preliminary Injunction and Challenge Receiver's Determination.	1.70	495.00	841.50
11-12-2024	KRG	Review and preserve documents in Microsoft eDiscovery for 2023 investments made by R. Sasson and I. Behar through LLC's, update investments portion of LLC spreadsheet re: same.	3.60	195.00	702.00
11-12-2024	KRG	Review and preserve documents in eDiscovery re: personal loans for R. Sasson, I. Behar and D. Blumkin from Citibank, HSBC, and First Republic Bank, draft loan section of LLC spreadsheet re: same.	1.80	195.00	351.00
11-12-2024	KRG	Continue to update real property portion of LLC spreadsheet.	1.00	195.00	195.00
11-12-2024	LDS	Review and revise multiple versions of opposition brief re: modifying PI (naming new Receivership Defendants).	2.20	595.00	1,309.00
11-12-2024	LDS	Conduct research re: Monevo claims and confer internally re: same.	1.20	595.00	714.00
11-13-2024	LDS	Review opposition to Renewed Motion to Modify PI and circulate revisions; confer with A. Wall re: same.	0.70	595.00	416.50
11-13-2024	LDS	Consider issues re: CIBC and review and send	0.30	595.00	178.50

Date	Professional	Description	Hours	Rate	Amount
		internal emails re: same.			
11-13-2024	KRG	Draft COBRA letter to be sent to former employee re: deadline to elect coverage.	0.90	195.00	175.50
11-13-2024	KRG	Continue drafting of LLC spreadsheet, begin using Microsoft eDiscovery and documents preserved on-site to identify which LLC's on LLC list are irrelevant, review investments from November 2023 transaction log, update investments portion of spreadsheet re: same, confirm ownership structure of relevant LLC's.	6.10	195.00	1,189.50
11-13-2024	ADW	Review Plaintiffs' Memorandum in Opposition to Strategic Defendants' Motion to Amend PI and Challenging Receiver's Determination; confer with L. Smith re: additional changes to Receiver's Opposition; revise Receiver's Opposition to add additional information, including the result of Strategic Defendants' original motion; perform final review and revisions, and finalize for filing.	2.10	495.00	1,039.50
11-14-2024	ADW	Meeting of Receiver's team re: third-party claims and related matters.	0.80	495.00	396.00
11-14-2024	ADW	Review email from Box.com re: deleted StratFS data room folders; email to T. McNamara and L. Smith re: deleted data room folders and potential contempt of Preliminary Injunction.	0.40	495.00	198.00
11-14-2024	ADW	Review F. Pina's revisions and suggestions for audit letter to MEC Distribution; revise letter to add Versara Lending and clarify the applicable Lead Provider Agreements, and correct errors and formatting; email to T. McNamara with copy of revised letter and explanation of changes.	1.10	495.00	544.50
11-14-2024	ADW	Review Stipulated Order re: Law Firm withdrawal of representation; confer with K. Galvin re: agenda items; draft agenda for meeting of Receiver's team re: third-party claims and related issues.	0.40	495.00	198.00
11-14-2024	ADW	Review and revise audit letter to Mandaree Enterprises and related entities.	1.20	495.00	594.00
11-14-2024	KRG	Continue drafting of LLC spreadsheet, tracing assets, complete process of determining relevant LLC's.	4.50	195.00	877.50
11-14-2024	KRG	Prepare for StratFS third-party claims meeting, confer with L. Jones re: third-party individual's investment history with StratFS entities.	0.50	195.00	97.50
11-14-2024	KRG	Meet with attorney team re: StratFS third-party claims.	0.80	195.00	156.00
11-14-2024	LDS	Participate in team meeting re: outstanding items and third-party assets.	0.80	595.00	476.00

Date	Professional	Description	Hours	Rate	Amount
11-14-2024	LDS	Consider settlement strategy with Monevo, review related emails and respond thereto.	0.30	595.00	178.50
11-15-2024	LDS	Investigate Box.com account; confer with B. Reiss and K. Galvin re: same; update T. McNamara; review internal emails and results of investigation.	1.40	595.00	833.00
11-15-2024	LDS	Review audit letter to Mandaree and confer with A. Wall re: same.	0.30	595.00	178.50
11-15-2024	LDS	Confer with K. Galvin re: asset analysis and email CFPB re: request for meeting.	0.30	595.00	178.50
11-15-2024	LDS	Confer with A. Wall and T. McNamara re: potential items to address with Court in hearing next week and review of Request for Further Instruction and protection of consumers.	0.80	595.00	476.00
11-15-2024	LDS	Confer with A. Wall and counsel re: insurance; conduct follow-up research re: insurance.	0.60	595.00	357.00
11-15-2024	KRG	Confer with A. Wall re: Box.com email re: deleted folders, correspond with B. Reiss re: same.	0.20	195.00	39.00
11-15-2024	KRG	Review documents in Microsoft eDiscovery re: F. Driscoll/Mandaree 2023 loan.	0.70	195.00	136.50
11-15-2024	ADW	Confer with K. Galvin re: Box.com folder deletions; email to T. McNamara and L. Smith re: known information regarding the deletions.	0.20	495.00	99.00
11-15-2024	ADW	Meet with T. McNamara and L. Smith to prepare for upcoming status conference and discuss update to Request for Further Instruction.	0.80	495.00	396.00
11-15-2024	ADW	Email to J. O'Donnell re: surrender of Versara's lending license in Indiana.	0.10	495.00	49.50
11-15-2024	ADW	Draft letter to Court re: updates concerning Request for Further Instruction; email to B. Reiss requesting information re: Exela mail processing.	2.70	495.00	1,336.50
11-15-2024	ADW	Confer with L. Smith and counsel re: insurance.	0.20	495.00	99.00
11-15-2024	KRG	Confer with L. Smith re: asset analysis and email CFPB re: request for meeting.	0.30	195.00	58.50
11-15-2024	KRG	Finalize LLC spreadsheet, including investments, loans, ownership structure, and real property, confer with A. Wall re: same.	4.70	195.00	916.50
11-16-2024	LDS	Send email and review issues re: developments with consumers and prior request for instruction and consider items needed to be provided to the Court in advance of hearing.	0.40	595.00	238.00

Date	Professional	Description	Hours	Rate	Amount
11-17-2024	LDS	Review email re: logistical issues raised by T. McNamara to counsel for Law Firm; review related emails from T. McNamara.	0.30	595.00	178.50
11-17-2024	LDS	Review draft prepared by A. Wall of potential items to provide the Court in advance of upcoming hearing.	0.30	595.00	178.50
11-18-2024	LDS	Meet with team re: third-party claims and related issues.	0.80	595.00	476.00
11-18-2024	LDS	Prepare draft Request for Instruction and confer internally re: same.	2.20	595.00	1,309.00
11-18-2024	LDS	Confer with J. Thoman, R. Cummings, and A. Wall re: potential claims to be investigated.	0.60	595.00	357.00
11-18-2024	LDS	Conduct legal research on potential receivership claims.	0.50	595.00	297.50
11-18-2024	KRG	Continue to organize documents in server re: LLC's based on investments, lending, and real property.	1.50	195.00	292.50
11-18-2024	KRG	Review COBRA invoices for employees, create COBRA invoice tracker and payment chart, confer with L. Jones re: same.	1.80	195.00	351.00
11-18-2024	KRG	Begin spreadsheet of updated COBRA invoices for L. Jones to review.	1.70	195.00	331.50
11-18-2024	KRG	Meet with attorney team re: third-party claims and related matters.	0.80	195.00	156.00
11-18-2024	KRG	Correspond with B. Reiss and Box.com re: additional information on Box.com folders.	0.20	195.00	39.00
11-18-2024	ADW	Meeting of Receiver's team re: third-party claims and related matters.	0.80	495.00	396.00
11-18-2024	ADW	Call with J. Thoman, R. Cummings, and L. Smith re: matters relating to insurance.	0.60	495.00	297.00
11-18-2024	ADW	Multiple calls with NMLS re: changing administrative access to NMLS account; call to B. Ball at Indiana Commissioner of Banks re: status of loan surrender and NMLS situation; complete NMLS Change of Administrator Form; email form to J. O'Donnell for review and approval.	1.70	495.00	841.50
11-18-2024	ADW	Email to F. Pina with update re: audit of MEC and finalized copy of audit letter.	0.20	495.00	99.00
11-18-2024	ADW	Review and revise Letter to Court re: updates concerning Request for Further Instruction, including new information in light of recent	0.30	495.00	148.50

Date	Professional	Description	Hours	Rate	Amount
		conversations between Receiver and Intervenor Law Firms' counsel.			
11-18-2024	ADW	Review addresses for MEC Distribution and Mandaree Enterprises; confer internally re: address to send audit letter via FedEx and additional addresses for mailing.	0.20	495.00	99.00
11-19-2024	ADW	Email to J. O'Donnell re: change of NMLS administrator for Versara Lending.	0.10	495.00	49.50
11-19-2024	ADW	Draft Letter of Explanation re: change of NMLS Administrator; email to NMLS with Add/Delete Form and copy of Preliminary Injunction.	0.40	495.00	198.00
11-19-2024	ADW	Call with representative from NMLS re: additional requirements for changing Versara's NMLS Administrators.	0.20	495.00	99.00
11-19-2024	ADW	Review and analyze Clover Community Funds' motion to lift stay re: dilution of Blaise Investments' interest in Fund V and Fund VI and supporting affidavits.	0.30	495.00	148.50
11-19-2024	KRG	Continue drafting spreadsheet of updated monthly COBRA invoices for employees.	4.20	195.00	819.00
11-19-2024	KRG	Create collection and review set for Board of Advisors and Directors in Microsoft eDiscovery.	0.40	195.00	78.00
11-19-2024	LDS	Review emails re: Versara and return of money in certain accounts.	0.40	595.00	238.00
11-19-2024	LDS	Engage in analysis of potential receivership estate assets, related asset tracing, and send email re: same; confer internally re: same.	1.20	595.00	714.00
11-19-2024	LDS	Evaluate proposal to invest in entity known as Clover Communities and confer with T. McNamara re: same.	0.20	595.00	119.00
11-20-2024	LDS	Evaluate potential claims against third-parties receiving transfers; conduct related legal research re: same.	1.50	595.00	892.50
11-20-2024	KRG	Continue drafting spreadsheet of COBRA invoices for employees, updating COBRA invoice tracking chart re: same.	5.50	195.00	1,072.50
11-20-2024	KRG	Monitor review set progress for Board of Advisors and Board of Directors collection in Microsoft eDiscovery platform.	0.30	195.00	58.50
11-21-2024	KRG	Prepare for call with CFPB, confer with L. Smith and A. Wall re: same.	1.60	195.00	312.00
11-21-2024	KRG	Attend call with CFPB re: outstanding assets and	1.40	195.00	273.00

Date	Professional	Description	Hours	Rate	Amount
		LLC's related to Defendants.			
11-21-2024	KRG	Review Board of Directors and Advisory Board related information in Microsoft eDiscovery platform, preserve and send findings to L. Smith.	1.80	195.00	351.00
11-21-2024	KRG	Search for T. Macey and C. Christo related documents in Microsoft eDiscovery portal, preserve relevant documents re: same.	1.00	195.00	195.00
11-21-2024	LDS	Participate in call with CFPB team and K. Galvin re: receivership estate assets and tracing of assets; confer with K. Galvin re: same.	1.40	595.00	833.00
11-21-2024	LDS	Send update email re: evaluation of PI terms and consider strategy re: same.	0.30	595.00	178.50
11-21-2024	LDS	Investigate third-party claims and potential assets.	0.80	595.00	476.00
11-21-2024	LDS	Confer with Strategic personnel re: ongoing business operations and consumers	0.60	595.00	357.00
11-21-2024	ADW	Video conference with counsel for CFPB re: discussion of potential receivership assets identified and which assets have been frozen; confer with L. Smith and K. Galvin re: assets and Mandaree.	1.40	495.00	693.00
11-21-2024	ADW	Email exchange with D. Maschenic at Beacon Group re: return of Versara Lending lender bond.	0.30	495.00	148.50
11-21-2024	ADW	Perform research re: consumer loan licensing in Indiana; email to B. Ball of Indiana Department of Financial Institutions surrendering Versara's license.	0.80	495.00	396.00
11-21-2024	ADW	Run IP address of individual who deleted Box.com folders through IP search engines to determine location of individual.	0.30	495.00	148.50
11-22-2024	LDS	Investigate Box.com claims and missing data issues; confer with B. Reiss and K. Galvin re: same; confer with T. McNamara re: same	0.50	595.00	297.50
11-22-2024	LDS	Investigate issues re: Intervenor Law Firms and access to Global accounts; confer with B. Reiss and J. O'Donnell re: same.	1.20	595.00	714.00
11-22-2024	KRG	Call with B. Reiss and L. Smith re: former employee's files, correspond with T. McNamara re: same.	1.30	195.00	253.50
11-22-2024	KRG	Confer with L. Jones re: Protiviti relationship with StratFS and third-party individual.	0.20	195.00	39.00
11-22-2024	KRG	Review email from B. Reiss re: IP geolocation and process re: discovering former employee's	0.30	195.00	58.50

Date	Professional	Description	Hours	Rate	Amount
		corporate documents.			
11-22-2024	KRG	Correspond with Box.com customer service team re: items titled "external document".	0.20	195.00	39.00
11-22-2024	KRG	Correspond with B. Reiss re: review set creation failure in Microsoft eDiscovery platform and troubleshooting re: same.	0.10	195.00	19.50
11-25-2024	LDS	Investigate issues re: law firm access and implications; consider recent activity and response re: same to Global; confer with J. O'Donnell and B. Reiss throughout day.	2.50	595.00	1,487.50
11-25-2024	KRG	Finalize updated COBRA invoices, confer with L. Jones re: review of same.	1.80	195.00	351.00
11-26-2024	KRG	Monitor receivership inbox for employee inquiries re: COBRA and 401k.	0.20	195.00	39.00
11-26-2024	ADW	Confer with L. Jones re: apparent referral of Intervenor Law Firm clients to new firms; review email from J. O'Donnell re: same; perform research re: Franklin and Lighthouse law firms, especially whether any connection to StratFS or the Intervenor Law Firms exists; email to L. Smith and L. Jones with thoughts and suggestions.	0.70	495.00	346.50
11-26-2024	ADW	Review letter from Minnesota Department of Commerce re: revocation of Versara Lending's lender license.	0.20	495.00	99.00
11-26-2024	LDS	Continue to investigate issues re: Global and potential outcomes, and consumer harm; confer with Strategic personnel re: same.	1.20	595.00	714.00
11-27-2024	LDS	Review number of emails re: Global and impact on consumers and confer with J. O'Donnell and B. Reiss re: same.	1.40	595.00	833.00
11-27-2024	KRG	Review Board of Advisors and Board of Directors related correspondence in Microsoft eDiscovery Platform, save relevant documents re: same for further analysis.	2.70	195.00	526.50
11-29-2024	LDS	Review Monevo's motion to dismiss and review related email re: same.	0.30	595.00	178.50
11-29-2024	ADW	Review and analyze Monevo's motion to dismiss, supporting memorandum, and declaration of I. Rainey; email to T. McNamara and L. Smith with initial thoughts and strategy re: same.	1.60	495.00	792.00
			Total	162.80	61,276.00

Time Summary

Professional	Hours	Rate	Amount
Alexander D. Wall	41.50	495.00	20,542.50
Keegan Galvin	78.60	195.00	15,327.00
Logan D. Smith	42.70	595.00	25,406.50
Total		162.80	61,276.00

Expenses

Date	Description	Amount
11-18-2024	Delivery services/messengers: FedEx - Notice of intent to conduct audit to MEC Distribution	41.40
	Total Expenses	41.40
	Total for this Invoice	61,317.40



L A W Y E R S

December 31, 2024

Invoice Period: 12-01-2024 - 12-31-2024

RE: 2158.02 MS

StratFS Receivership

Time Details

Date	Professional	Description	Hours	Rate	Amount
12-01-2024	LDS	Continue to consider steps that need to be taken re: referrals of clients by Global Solutions.	0.40	595.00	238.00
12-02-2024	LDS	Consider immediate next steps following Global potential violations of PI and investigate further throughout day, including sending email T. McNamara re: next immediate steps to be taken re: Global; conferring with T. McNamara re: Global issues; conferring with counsel for Plaintiff; and participating in follow-up discussions re: Global's referral of clients and use of StratFS data; investigate third parties to whom Global is making referrals; consider potential responses.	1.80	595.00	1,071.00
12-02-2024	LDS	Review email from Ice Legal's personal counsel re: request and send follow-up email to T. McNamara re: same; consider next steps.	0.50	595.00	297.50
12-02-2024	LDS	Review Monevo motion to dismiss based on arbitration provisions and Federal Arbitration Act; conduct related legal research on context of arbitration clause in receivership context with focus on Stanford Bank receivership; send related email re: same and consider whether to draft response thereto; discuss internally.	1.30	595.00	773.50
12-02-2024	LDS	Review internal StratFS Board of Director and Board of Advisor Minutes and internal business materials.	0.80	595.00	476.00
12-02-2024	KRG	Correspond with B. Reiss and E. Rovner re: Microsoft eDiscovery review sets not populating.	0.20	195.00	39.00
12-02-2024	KRG	Review Board of Directors related correspondence in Microsoft eDiscovery portal, preserve relevant documents.	3.80	195.00	741.00
12-02-2024	KRG	Correspond with L. Jones re: COBRA invoice creation progress and review process.	0.10	195.00	19.50
12-02-2024	ADW	Review Blust Family Trust's Objections to Order	0.40	495.00	198.00

Date	Professional	Description	Hours	Rate	Amount
granting Receiver's 2nd Interim Fee Application.					
12-02-2024	ADW	Perform legal research re: enforcement of Receivership Defendants arbitration provision.	2.00	495.00	990.00
12-02-2024	ADW	Call with attorney L. Shapiro re: alleged harassing phone calls from Rockwell Client Services; perform research re: debt collection calls from Rockwell Client Services' business address; email to L. Shapiro responding and seeking additional information re: identity of caller.	0.80	495.00	396.00
12-03-2024	ADW	Meet with Receiver's team re: third-party claims and related matters.	0.60	495.00	297.00
12-03-2024	KRG	Review Advisors Board/Board of Directors correspondence in Microsoft eDiscovery portal, preserve relevant documents re: potential third-party claim.	2.20	195.00	429.00
12-03-2024	KRG	Meet with attorney team re: StratFS third-party claims.	0.60	195.00	117.00
12-03-2024	KRG	Attend call with S. Chiang re: asset tracing for Timberline entities.	1.70	195.00	331.50
12-03-2024	LDS	Review memorandum by Mercadien and set up forensic accounting review led by S. Chiang; confer with S. Chiang re: same and assemble materials for her review; consider proper scope of project.	1.70	595.00	1,011.50
12-03-2024	LDS	Consider obligations re: Royal and Hailstone (contingent fee law firms) and send related emails re: request for data and response.	0.20	595.00	119.00
12-03-2024	LDS	Consider personnel issues and potential transition issues re: B. Reiss and review issues raised by L. Jones and T. McNamara; participate in call re: same.	1.00	595.00	595.00
12-03-2024	LDS	Participate in team meeting re: assets, third-party claims and related matters.	0.60	595.00	357.00
12-03-2024	LDS	Confer with L. Jones re: asset tracing project and documents to be provided to S. Chiang.	0.30	595.00	178.50
12-04-2024	LDS	Confer with client and Plaintiffs' counsel re: Global and next steps.	0.40	595.00	238.00
12-04-2024	LDS	Investigate next steps re: Global and outreach to consumers and discuss options with T. McNamara.	1.10	595.00	654.50
12-04-2024	KRG	Draft chronology of Box.com deletion activity by former employee and attachments re: same, send to A. Wall.	0.70	195.00	136.50

Date	Professional	Description	Hours	Rate	Amount
12-04-2024	KRG	Confer multiple times with L. Jones re: tax returns, Defendant's personal loan documents; review of S. Quach email for tax returns.	0.70	195.00	136.50
12-04-2024	KRG	Review Microsoft eDiscovery for tax returns of LLC's re: asset tracing, preserve documents re: same.	3.90	195.00	760.50
12-04-2024	KRG	Load S. Quach's .pst onto computer, review .pst file for additional offshoot LLC tax returns, use preserved document index from StratFS NYC site to locate passwords to returns, preserve same for further investigation	2.10	195.00	409.50
12-05-2024	KRG	Organize documents re: Advisory Board, Board of Directors, and Compensation committee for L. Smith, review D&O policy re: same.	1.20	195.00	234.00
12-05-2024	KRG	Correspond with L. Smith and A. Wall re: Board of Directors, Advisory Board, and D&O policy.	0.60	195.00	117.00
12-05-2024	KRG	Review third-party individual's correspondence in Microsoft eDiscovery for compliance related emails with Board of Directors or Advisory Board.	1.10	195.00	214.50
12-05-2024	LDS	Prepare for call with Global's counsel re: potential violation of PI; confer with T. McNamara in advance of same and review PI and related materials and emails; confer with counsel for Global following same; follow-up with T. McNamara.	1.50	595.00	892.50
12-05-2024	LDS	Confer with counsel for CFPB with update and update T. McNamara re: same.	0.70	595.00	416.50
12-05-2024	LDS	Confer with counsel for former employee re: return of materials; confer with B. Reiss re: same; confer with T. McNamara re: same; send related emails to effect return of materials and establish protocol for same.	1.00	595.00	595.00
12-05-2024	LDS	Draft and send follow-up email re: potential settlement discussions and send related emails; consider materials to send to Monevo and send internal emails re: same.	0.70	595.00	416.50
12-05-2024	LDS	Confer with S. Chiang re: engagement to trace assets and confer internally with L. Jones and K. Galvin re: same; review materials to send to S. Chiang.	1.20	595.00	714.00
12-05-2024	LDS	Review materials drafted by Mercadien.	0.30	595.00	178.50
12-05-2024	ADW	Email exchange with A. Lovin of Office of Kansas State Bank Commissioner re: setting up call to discuss Versara licensing.	0.10	495.00	49.50
12-05-2024	ADW	Perform legal research re: Kansas state	0.80	495.00	396.00

Date	Professional	Description	Hours	Rate	Amount
		supervised lender licensing requirements.			
12-05-2024	ADW	Call with A. Lovin of Office of Kansas State Bank Commissioner re: setting up call to discuss Versara licensing.	0.40	495.00	198.00
12-06-2024	ADW	Email exchanges with T. McNamara and L. Smith re: terms of Mandaree Enterprises audit and Mandaree Enterprises' request for extension of production date.	0.30	495.00	148.50
12-06-2024	ADW	Assemble all Strategic invoices to Monevo for 2021-23 and email to I. Rainey for review in advance of settlement call scheduled for 12/10.	0.20	495.00	99.00
12-06-2024	LDS	Review and revise draft Tolling Agreement and circulate same; review issues re: failure to turn over client file.	1.20	595.00	714.00
12-06-2024	LDS	Email A. Wall and consider materials to be sent to be Monevo's counsel in advance of call.	0.30	595.00	178.50
12-06-2024	LDS	Conduct research for, review docket and prior filings and draft legal brief/letter to Court with update re: Request for Instruction; discuss internally; confer with and send to T. McNamara re: same.	2.30	595.00	1,368.50
12-06-2024	LDS	Confer with Strategic personnel (J. O'Donnell) re: Global and RAM and consumers without active payment plans.	0.30	595.00	178.50
12-06-2024	LDS	Confer with Plaintiff's Counsel re: Request for Instruction and send related emails.	0.50	595.00	297.50
12-06-2024	KRG	Confer with L. Jones re: process of uploading accounting and investments docs into OneDrive for S. Chiang to review.	0.20	195.00	39.00
12-06-2024	KRG	Create OneDrive shared folder for L. Jones and S. Chiang re: asset tracing; upload tax, investments, accounting, and loan related documents re: same for review.	0.70	195.00	136.50
12-06-2024	KRG	Correspond with S. Chiang re: context on chronology of defendant's personal loans and access to password-protected tax documents.	0.30	195.00	58.50
12-06-2024	KRG	Correspond with E. Rovner re: Advisory Board/Board of Directors review set in Microsoft eDiscovery.	0.20	195.00	39.00
12-06-2024	KRG	Confer with A. Wall re: employee's return of Box.com documents.	0.10	195.00	19.50
12-06-2024	KRG	Review third-party individual's related correspondence in Microsoft eDiscovery platform.	0.70	195.00	136.50

Date	Professional	Description	Hours	Rate	Amount
12-06-2024	KRG	Review Microsoft eDiscovery platform for term sheets re: personal loans for defendants, and preserve same.	0.50	195.00	97.50
12-06-2024	KRG	Create Microsoft eDiscovery case re: Protiviti, briefly review same re: audit folder recovered from third-party individual returned deletions.	0.50	195.00	97.50
12-06-2024	KRG	Continue to review Microsoft eDiscovery platform for form 1040 tax-related documents for defendants, and preserve same.	1.40	195.00	273.00
12-06-2024	LDS	Confer with L. Jones re: documents compiled and provided for asset tracing project.	0.10	595.00	59.50
12-08-2024	LDS	Review revised version of letter from T. McNamara and send edits thereto with supporting email.	1.60	595.00	952.00
12-09-2024	LDS	Participate in team meeting re: third-party claims and related matters.	0.50	595.00	297.50
12-09-2024	LDS	Continue to review and revise the draft legal brief/ Request for Instruction re: next steps with consumers.	1.40	595.00	833.00
12-09-2024	LDS	Draft proposed order re: Request for Instruction.	1.20	595.00	714.00
12-09-2024	LDS	Draft anticipated consumer notice in support of same.	1.80	595.00	1,071.00
12-09-2024	LDS	Confer with CFPB and Plaintiffs' counsel and Receiver re: Request for Instruction and consumers.	0.80	595.00	476.00
12-09-2024	LDS	Prepare for call with Monevo; conduct legal research on statutory interest and prepare calculations for purposes of call; confer with A. Wall re: same.	0.80	595.00	476.00
12-09-2024	KRG	Review COBRA invoices from Highmark, cross reference same with COBRA invoices created for employees, confer briefly with L. Jones re: same.	0.60	195.00	117.00
12-09-2024	KRG	Create case for M. Thurman-related correspondence in Microsoft eDiscovery, review same re: potential third-party claims.	0.80	195.00	156.00
12-09-2024	KRG	Review three of R. Sasson's business journals for information re: third-party claims.	1.60	195.00	312.00
12-09-2024	KRG	Attend meeting with attorney team re: StratFS third-party claims.	0.50	195.00	97.50
12-09-2024	KRG	Correspond with S. Chiang re: gaining access to accounting documents re: StratFS asset tracing.	0.10	195.00	19.50

Date	Professional	Description	Hours	Rate	Amount
12-09-2024	ADW	Confer internally re: updates on recent receivership notices to bank and other asset holders.	0.50	495.00	247.50
12-09-2024	ADW	Review and revise draft Tolling Agreement re: claims against Ice Legal.	0.40	495.00	198.00
12-09-2024	ADW	Review and analyze Blust Family Trust's Objections to Order Allowing Receiver's 2nd Fee Application; review and analyze numerous prior filings and orders concerning the same or related issues re: Blust Family Trust; begin drafting Response re: same.	2.60	495.00	1,287.00
12-09-2024	ADW	Confer with L. Smith re: amounts due from Monevo, basis for calculating amounts due, and pre-judgment interest, in preparation for settlement call on 12/10.	0.30	495.00	148.50
12-09-2024	ADW	Meet with Receiver's team re: third-party claims and related matters.	0.50	495.00	247.50
12-10-2024	ADW	Call C. Ball re: Monevo amounts due.	0.10	495.00	49.50
12-10-2024	ADW	Call with I. Rainey and S. Wells, counsel for Monevo, and J. Thoman and L. Smith re: settlement and related issues; confer with K. Galvin re: Monevo emails; confer with L. Smith re: Monevo's position and settlement issues.	0.80	495.00	396.00
12-10-2024	ADW	Call with C. Ball re: Monevo invoices and amounts due, and communications with Monevo.	0.30	495.00	148.50
12-10-2024	ADW	Call with A. Mendez, counsel for Chapter 7 Trustee in Florida bankruptcy matter, re: Atlas Debt Relief client O. Rodriguez and request for account documents; email to J. O'Donnell requesting copies of requested documents.	0.30	495.00	148.50
12-10-2024	ADW	Review, proofread, and finalize Letter to Court re: Request for Further Instruction, proposed Order, and Exhibits; file documents via PACER; email to Hodgson Russ with courtesy copies for delivery to chambers.	0.50	495.00	247.50
12-10-2024	ADW	Draft Response to Blust Family Trust's Objections re: Order Allowing 2nd Fee Application.	2.50	495.00	1,237.50
12-10-2024	KRG	Review info@regulatoryresolutions.com inbox for outstanding emails from consumers; organize and respond to same.	1.00	195.00	195.00
12-10-2024	KRG	Review M. Thurman-related correspondence re: potential third-party claim, preserve relevant documents re: same for further review.	2.00	195.00	390.00
12-10-2024	KRG	Continue to review Microsoft eDiscovery platform	2.10	195.00	409.50

Date	Professional	Description	Hours	Rate	Amount
		for additional receivership assets relating to defendants.			
12-10-2024	LDS	Confer with counsel for Global re: next steps and consider implications of same.	0.60	595.00	357.00
12-10-2024	LDS	Prepare for and participate in call with counsel for Monevo and J. Thoman and A. Wall; prepare calculations for basis of demand and review internal records re: same.	1.40	595.00	833.00
12-10-2024	LDS	Continue to prepare package of materials relating to Request for Instruction to be submitted to Court and revise drafts of Letter and proposed Order re: same; confer with Receiver throughout day; input edits from J. Thoman and Receiver; finalize and file letter; select and review exhibits.	2.00	595.00	1,190.00
12-10-2024	LDS	Consider issues re: closure of Global and RAM Consumer accounts where there are no active payments and consider logistics with Receiver and Strategic personnel, which are related, but separate, from letter to Court.	1.80	595.00	1,071.00
12-10-2024	LDS	Review order re: hearing and internally discuss update of Court's hearing and matters covered.	0.40	595.00	238.00
12-10-2024	LDS	Follow up with Strategic personnel re: Box.com materials.	0.30	595.00	178.50
12-11-2024	LDS	Conduct research on claims re: Monevo and reasonable settlement posture and amount of interest.	0.80	595.00	476.00
12-11-2024	LDS	Draft Tolling Agreement and conduct research on client file retention and wrongful withholding of access to file.	0.80	595.00	476.00
12-11-2024	LDS	Draft motion to close accounts and return funds, supporting materials including draft notice, declaration from Receiver, and proposed order.	2.20	595.00	1,309.00
12-11-2024	LDS	Confer with RAM to discuss contemplated closure of consumer accounts and relief to be requested from Court.	0.40	595.00	238.00
12-11-2024	LDS	Review letter from Global and discuss briefly with Receiver.	0.30	595.00	178.50
12-11-2024	LDS	Review email and confirm with Strategic personnel that materials have been returned; confer with Receiver re: same.	0.30	595.00	178.50
12-11-2024	LDS	Review request from RAM for payment and circulate internally and to Strategic personnel; review emails and discuss briefly with J. O'Donnell and L. Jones.	0.40	595.00	238.00

Date	Professional	Description	Hours	Rate	Amount
12-11-2024	KRG	Review Board of Advisors/Directors review set in Microsoft eDiscovery for "fiduciary" related documents.	0.50	195.00	97.50
12-11-2024	KRG	Review StratFS terminations, analyze same re: COBRA eligibility letters, confer briefly with L. Jones re: same.	0.80	195.00	156.00
12-11-2024	KRG	Review documents provided by former employee and save relevant documents.	1.70	195.00	331.50
12-11-2024	KRG	Review preserved documents re: Board of Directors, draft analysis re: same, circulate same to A. Wall and L. Smith re: StratFS third-party claims.	1.10	195.00	214.50
12-11-2024	KRG	Continue to review preserved Advisory Board related information from eDiscovery to draft analysis for L. Smith and A. Wall re: StratFS third-party claims.	0.50	195.00	97.50
12-11-2024	KRG	Upload additional documents in shared OneDrive with S. Chiang re: Bitcoin investments, Origin Investments in real property, and additional K-1 documents.	0.30	195.00	58.50
12-11-2024	ADW	Review email from A. Lovin of Kansas State Bank Commissioner re: Versara's licensing status; perform legal research re: lender licensing requirements in Kansas; email to A. Lovin re: same.	0.70	495.00	346.50
12-11-2024	ADW	Email exchange with C. Ball re: lead data reports from Monevo; review lead data report and compare to invoiced and reconciled amounts due from Monevo.	0.70	495.00	346.50
12-11-2024	ADW	Continue drafting Response to Blust Family Irrevocable Trust's Objections to Order re: Receiver's 2nd Fee Application.	2.90	495.00	1,435.50
12-12-2024	ADW	Review email from A. Lovin of Kansas State Bank Commissioner re: Versara loan collection and relationship with Vervent; confer with L. Jones re: flow of funds remitted on Versara loans; email to A. Lovin responding to questions and requesting written clarification of Kansas State Bank Commissioner's position re: Versara's need for lending license.	1.00	495.00	495.00
12-12-2024	ADW	Review email from J. O'Donnell re: unable to locate consumer records for Atlas client; review documents from Florida bankruptcy trustee and provide additional client information to J. O'Donnell to facilitate record search.	0.40	495.00	198.00
12-12-2024	ADW	Review email from S. Reed of Missouri Attorney General's Office re: consumer questions concerning lawsuit; confer internally and send	0.40	495.00	198.00

Date	Professional	Description	Hours	Rate	Amount		
		email to S. Reed responding to consumer inquiry.					
12-12-2024	KRG	Continue to review Advisory Board correspondence, identify relevant documents, review Advisory Board agreement, confer briefly with A. Wall re: same, draft analysis of Advisory Board members and agreement for L. Smith and A. Wall re: StratFS third-party claims.	1.90	195.00	370.50		
12-12-2024	KRG	Review insurance policy, confer with A. Wall and L. Jones re: same, begin drafting analysis for attorneys re: same.	2.20	195.00	429.00		
12-12-2024	LDS	Prepare motion re: payment processors and send edits thereto to T. McNamara; confer internally with T. McNamara and Strategic personnel (J. O'Donnell) re: statistics and monthly withdrawals and make edits to Motion and Order re: same; email T. McNamara re: same.	1.80	595.00	1,071.00		
12-12-2024	LDS	Send follow-up emails to counsel for payment processors re: closure of accounts.	0.30	595.00	178.50		
12-12-2024	LDS	Draft email to counsel for Ice Legal re: access to client files, next steps, and tolling agreement.	0.40	595.00	238.00		
12-12-2024	LDS	Consider project to review and trace assets and email S. Chiang re: same and review related materials.	0.40	595.00	238.00		
12-12-2024	LDS	Confer with Strategic personnel re: StratFS consumers and payments.	0.50	595.00	297.50		
12-13-2024	LDS	Participate in emails and follow-up phone calls with counsel for payment processors to discuss logistics of closure of certain accounts and return of funds; confer with T. McNamara re: update.	1.30	595.00	773.50		
12-13-2024	LDS	Finalize and send email re: extension to respond, Tolling Agreement, demand for client file, and next steps.	0.80	595.00	476.00		
12-13-2024	KRG	Complete draft memorandum re: insurance policy and Advisory Board/Board of Director agreements, confer multiple times with A. Wall re: same, circulate memorandum re: same to A. Wall, L. Jones, and L. Smith.	2.80	195.00	546.00		
12-13-2024	KRG	Confer with S. Chiang and L. Smith re: call to discuss asset tracing project.	0.20	195.00	39.00		
12-13-2024	KRG	Correspond with B. Reiss re: former employee COBRA eligibility.	0.20	195.00	39.00		
12-13-2024	KRG	Review ADP for total number of active employees re: T. Wisner (Highmark) request for information, follow up with T. Wisner re: same.	0.20	195.00	39.00		

Date	Professional	Description	Hours	Rate	Amount
12-13-2024	KRG	Review Mercadien report re: asset tracing, confer briefly with T. McNamara re: same.	0.30	195.00	58.50
12-13-2024	KRG	Review ESOP-related correspondence in Microsoft eDiscovery platform re: transfers in and out of ESOP trustee account.	0.50	195.00	97.50
12-13-2024	ADW	Continue drafting Response to Blust Family Irrevocable Trust's Objections to Order re: Receiver's 2nd Fee Application.	4.60	495.00	2,277.00
12-13-2024	LDS	Confer with S. Chiang and K. Galvin re: call to discuss asset tracing project.	0.20	595.00	119.00
12-15-2024	ADW	Perform legal research re: scope of asset freeze injunction and courts' authority to order payment of receivership expenses; continue drafting Opposition to Blust Trust's Objections to Order Allowing Receiver's 2nd Fee Application; send draft to L. Smith for review and revision.	4.90	495.00	2,425.50
12-15-2024	LDS	Consider details of closure of consumer accounts and send email re: same.	0.70	595.00	416.50
12-15-2024	LDS	Draft four separate consumer notice versions following Court's Order and send to T. McNamara.	1.30	595.00	773.50
12-15-2024	LDS	Review Opposition to Blust Trust motion.	0.30	595.00	178.50
12-16-2024	LDS	Email counsel for payment processors re: closure of active payment plans.	0.30	595.00	178.50
12-16-2024	KRG	Correspond with C. Ball re: ESOP transferring of funds, review portion of Mercadien report re: same, draft brief explanation re: same in preparation for StratFS third-party claims meeting.	0.50	195.00	97.50
12-16-2024	KRG	Review Highmark form re: group size, email Receiver re: same, and correspond with T. Wisner re: same.	0.30	195.00	58.50
12-16-2024	KRG	Review Sunseeker Charters, Inc. related correspondence in Microsoft eDiscovery re: ESOP 1042 findings from Mercadien report.	0.50	195.00	97.50
12-16-2024	KRG	Attend call with S. Chiang re: asset tracing check-in.	0.80	195.00	156.00
12-16-2024	KRG	Attend StratFS meeting re: third-party claims.	0.50	195.00	97.50
12-16-2024	KRG	Confer briefly with A. Wall re: insurance policy, send memorandum and accompanying attachments re: same for further review.	0.10	195.00	19.50
12-16-2024	ADW	Call with I. Rainey re: Strategic invoices to Monevo; review Monevo commission and payment spreadsheets from C. Ball; confer with L. Smith re:	0.80	495.00	396.00

Date	Professional	Description	Hours	Rate	Amount
		same.			
12-16-2024	ADW	Confer with L. Smith re: revisions to Opposition to Blust Trust's Objection re: 2nd Fee App Order, specifically law of the case doctrine; perform legal research re: law of the case and revise Opposition to include relevant law and supporting cases.	0.50	495.00	247.50
12-16-2024	ADW	Attend meeting with Receiver's team re: third-party claims and related matters.	0.50	495.00	247.50
12-16-2024	ADW	Review and revise Opposition to Blust Trust's Objection to Second Fee App Order; email to L. Smith and T. McNamara for further review.	0.70	495.00	346.50
12-16-2024	ADW	Review memorandum from Mercadien re: Strategic bank account tracing results and conclusions.	0.60	495.00	297.00
12-16-2024	ADW	Continue reviewing and revising Opposition to Blust Trust's Objection to 2nd Fee Application Order through multiple rounds of revision; proofread and finalize document for filing.	1.70	495.00	841.50
12-16-2024	ADW	Review and analyze Plaintiffs' Response to Blust Trust's Objection re: 2nd Fee Application Order.	0.30	495.00	148.50
12-16-2024	LDS	Revise motion to return consumer funds and related filings and review suggested edits from co-counsel.	1.80	595.00	1,071.00
12-16-2024	LDS	Review and revise multiple drafts of Opposition to Blust Trust objection and confer with A. Wall re: same throughout day.	1.70	595.00	1,011.50
12-16-2024	LDS	Confer with A. Wall and opposing counsel re: terms of potential settlement (Monevo).	0.40	595.00	238.00
12-16-2024	LDS	Conduct legal research on law of the case doctrine in Second Circuit in support of opposition brief; circulate same.	0.80	595.00	476.00
12-16-2024	LDS	Participate in team meeting re: third-party claims and related matters.	0.50	595.00	297.50
12-16-2024	LDS	Confer with K. Galvin and S. Chiang re: asset tracing project and review materials for potential assets to be traced.	0.30	595.00	178.50
12-16-2024	KRG	Attend additional follow-up call with S. Chiang re: asset tracing.	1.70	195.00	331.50
12-17-2024	KRG	Search in Microsoft eDiscovery for Duke Enterprises and Blaise Investments tax returns, download relevant documents re: same.	0.70	195.00	136.50
12-17-2024	KRG	Draft and review call notes with C. Ball re: StratFS	0.70	195.00	136.50

Date	Professional	Description	Hours	Rate	Amount
		ESOP circular funding to meet employer contribution, research how a leveraged ESOP traditionally functions and compare to leveraged ESOP done through Strategic and J. Urbach.			
12-17-2024	KRG	Search review sets in Microsoft eDiscovery for Fusion Capital LLC related correspondence for asset tracing project, review on-site documents re: same.	0.80	195.00	156.00
12-17-2024	KRG	Confer briefly with L. Smith re: asset tracing and recap of call with S. Chiang.	0.20	195.00	39.00
12-17-2024	KRG	Review J. Hart's StratFS Advisory Board Agreement, email A. Wall updated summary of third-party claims re: advisors and directors.	0.40	195.00	78.00
12-17-2024	KRG	Confer briefly with L. Jones re: bank statements of ESOP disbursements to Seller's in April 2018 and October 2019.	0.10	195.00	19.50
12-17-2024	KRG	Review S. Quach's StratFS .pst file and documents preserved from NYC in search of Duke Enterprises and Fusion Capital related tax documents.	0.90	195.00	175.50
12-17-2024	KRG	Update progress tracker re: TCIG asset tracing project.	0.20	195.00	39.00
12-17-2024	KRG	Correspond with S. Chiang re: bank statements for 4/30/18 and 10/31/19 ESOP related transactions, update shared drive re: same.	0.30	195.00	58.50
12-17-2024	KRG	Review Duke Enterprises 2017 tax return form 1065 for ownership structure of Duke, TCIG, document findings in progress tracker re: same.	0.30	195.00	58.50
12-17-2024	KRG	Upload ESOP and investment related documents found in Microsoft eDiscovery into SharePoint for S. Chiang to review.	0.50	195.00	97.50
12-17-2024	KRG	Research how to create flow of fund/hierarchy chart in excel, create chart to illustrate flow of funds/ownership re: Duke, Blaise, TCIG, and JHS Bitcoin mining, Inc., upload same into Microsoft SharePoint for S. Chiang to review.	0.50	195.00	97.50
12-17-2024	ADW	Videoconference with I. Rainey to review relevant documents re: payments to Strategic.	0.30	495.00	148.50
12-17-2024	LDS	Meet with T. McNamara and A. Wall re: Strategic ESOP valuation.	0.30	595.00	178.50
12-17-2024	LDS	Confer briefly with K. Galvin re: asset tracing and recap of call with S. Chiang.	0.20	595.00	119.00
12-17-2024	ADW	Meet with T. McNamara and L. Smith re: required	0.30	495.00	148.50

Date	Professional	Description	Hours	Rate	Amount
		information for D. Burdette to complete 2024 Strategic ESOP valuation.			
12-17-2024	ADW	Review and analyze numerous documents re: CIBC, UBS, and Zais financing, including loan and security agreements and documents re: Strategic's current assets; confer with L. Jones multiple times re: Strategic's financing agreements and financial condition; draft letter to D. Burdette re: ESOP's equity and 2024 valuation of Strategic ESOP.	3.90	495.00	1,930.50
12-17-2024	LDS	Participate in call with opposing counsel and A. Wall re: discussing amounts owed from Monevo and potential settlement.	0.50	595.00	297.50
12-17-2024	LDS	Prepare and circulate revised versions of Notice to Consumers following Court's Order and confer with client re: same; consider Receiver's edits thereto.	0.80	595.00	476.00
12-17-2024	LDS	Draft and send follow-up email to counsel for RAM re: motion.	0.20	595.00	119.00
12-17-2024	LDS	Confer with Strategic personnel (J. O'Donnell) re: logistics and IT needed for sending out consumer notice.	0.30	595.00	178.50
12-17-2024	LDS	Participate in follow-up call with Global's counsel following additional questions for Consumer Notice.	0.20	595.00	119.00
12-17-2024	ADW	Videoconference with I. Rainey, S. Wells, and L. Smith re: discussing amounts owed from Monevo and potential settlement.	0.50	495.00	247.50
12-17-2024	ADW	Follow-up call with I. Rainey, counsel for Monevo, re: records of payments.	0.10	495.00	49.50
12-18-2024	ADW	Videoconference with C. Ball, controller for Strategic, and L. Smith re: Monevo invoices and balance due, and supporting documentation; send follow-up email to C. Ball with request for certain relevant emails.	0.60	495.00	297.00
12-18-2024	ADW	Continue review and analysis of documents re: Strategic's outstanding liabilities and potential liability to consumers; continue drafting letter to D. Burdette re: ESOP's equity and 2024 valuation of Strategic ESOP, and email to L. Jones for review and comment.	3.10	495.00	1,534.50
12-18-2024	ADW	Confer with L. Smith re: strategy for settlement with Monevo.	0.30	495.00	148.50
12-18-2024	ADW	Review Western District of New York Local Rules and Chambers Rules re: requesting enlargements of time; draft letter motion to Court requesting extension of time to respond to Monevo's Motion to Dismiss.	0.90	495.00	445.50

Date	Professional	Description	Hours	Rate	Amount
12-18-2024	ADW	Review January 9, 2024 Lead Report from Monevo to Strategic; draft email to counsel for Monevo re: total commissions due based on Lead Report, and request for extension of time re: motion to dismiss.	0.50	495.00	247.50
12-18-2024	ADW	Confer with L. Jones re: Strategic's debt obligations and letter to D. Burdette; review and revise letter to D. Burdette; email to T. McNamara for review.	1.20	495.00	594.00
12-18-2024	ADW	Review Versara Lending Subordination Agreement of 2019; send email to L. Jones responding to question re: subordinated lenders' security interests.	0.30	495.00	148.50
12-18-2024	LDS	Confer with counsel for Global and T. McNamara re: closure of Global accounts for consumers with no active payment plans.	0.40	595.00	238.00
12-18-2024	LDS	Finalize notice to consumers approved by court and work with Receiver and StratFS personnel re: same; review and revise multiple versions of same.	1.90	595.00	1,130.50
12-18-2024	LDS	Email J. O'Donnell re: notice.	0.30	595.00	178.50
12-18-2024	LDS	Draft motion re: closure of accounts, declaration and proposed order re: same.	1.20	595.00	714.00
12-18-2024	LDS	Engage in follow-up calls and emails with Global counsel re: final details of pro rata closure of accounts depending on timing and update Receiver re: same.	0.80	595.00	476.00
12-18-2024	LDS	Confer with StratFS personnel and A. Wall re: Monevo; investigate internal records re: invoicing of Monevo; send supporting emails re: same; confer with A. Wall re: same.	1.20	595.00	714.00
12-18-2024	KRG	Prepare December invoices for COBRA participants, review COBRA invoices re: same.	1.50	195.00	292.50
12-19-2024	KRG	Review Iron Mountain invoice status sheet provided by L. Jones, confer with L. Jones re: response to Iron Mountain.	0.30	195.00	58.50
12-19-2024	KRG	Prepare December 2024 COBRA invoices, confer with L. Jones re: sending invoice batches out.	0.70	195.00	136.50
12-19-2024	KRG	Correspond with Iron Mountain re: outstanding invoices.	0.20	195.00	39.00
12-19-2024	KRG	Call with S. Chiang re: asset tracing project, specifically discuss Timberline Capital, TCIG, Fusion Capital, and deliverable for attorneys.	1.00	195.00	195.00

Date	Professional	Description	Hours	Rate	Amount
12-19-2024	KRG	Correspond with rehire employee re: benefits selection for dental and vision insurance, enroll rehire employee in vision and dental, correspond with A. Neujar (Ameritas) re: same.	0.30	195.00	58.50
12-19-2024	KRG	Continue to review documents in StratFS eDiscovery portal and S. Quach's StratFS .pst file re: relationship between Fusion Capital and TCIG, confer with S. Chiang re: same.	1.70	195.00	331.50
12-19-2024	KRG	Briefly review Mandaree audit.	0.30	195.00	58.50
12-19-2024	LDS	Confer with opposing counsel, J. Thoman, and A. Wall re: settlement.	0.50	595.00	297.50
12-19-2024	LDS	Investigate Monevo claims, including potential arguments against arbitration, participate in discussions with A. Wall re: same.	1.30	595.00	773.50
12-19-2024	LDS	Draft notice to RAM customers.	0.40	595.00	238.00
12-19-2024	LDS	Continue to draft and finalize motion to close accounts for consumers with no active payment plans; draft supporting declaration and draft order re: same; confer internally re: same.	1.50	595.00	892.50
12-19-2024	LDS	Consider potential responses to opposing counsel for Monevo and send related emails internally following call.	0.50	595.00	297.50
12-19-2024	ADW	Videoconference with L. Smith, J. Thoman, and I. Rainey, counsel for Monevo, re: settlement discussions with Monevo.	0.50	495.00	247.50
12-19-2024	ADW	Confer with K. Galvin re: obtaining copies of key emails between Strategic and Monevo.	0.20	495.00	99.00
12-19-2024	ADW	Review and analyze Monevo's emails and loan reports to Strategic; draft email to I. Rainey re: amounts owed based on reports, reason for additional amount due above invoiced amounts; and settlement, and send email to L. Smith for review and comment.	0.80	495.00	396.00
12-19-2024	ADW	Review and revise letter motion requesting extension of time to respond to Monevo's Motion to Dismiss, incorporating T. McNamara's suggestions; file via PACER.	0.40	495.00	198.00
12-19-2024	ADW	Confer multiple times with L. Jones re: CIBC and UBS loans and principal and interest amounts due; review and revise letter to D. Burdette multiple times to clarify discussion of Strategic's financials and add important information for valuation of Strategic ESOP for fiscal year 2024; assemble and prepare key documents as Exhibits A-J for letter.	2.30	495.00	1,138.50

Date	Professional	Description	Hours	Rate	Amount
12-19-2024	ADW	Review and further revise letter to D. Burdette re: valuation of Versara loan portfolio.	0.40	495.00	198.00
12-19-2024	ADW	Email to C. Ball re: payment of Vcorp invoices for Atlas and Timberline.	0.20	495.00	99.00
12-19-2024	ADW	Revise, proofread, and finalize letter to D. Burdette re: ESOP valuation; email to D. Burdette with link to Exhibits A-J.	0.50	495.00	247.50
12-19-2024	ADW	Confer with L. Smith re: settlement email to Monevo's counsel; revise and send email to I. Rainey.	0.40	495.00	198.00
12-20-2024	ADW	Review C. Ball's email re: Monevo invoices and trailing liability; email to L. Smith re: same.	0.20	495.00	99.00
12-20-2024	ADW	Confer with L. Smith re: settlement strategy with Monevo; call with I. Rainey, counsel for Monevo, and L. Smith re: settlement.	0.50	495.00	247.50
12-20-2024	LDS	Review Global notice to be sent to consumers and send follow email to StratFS personnel.	0.40	595.00	238.00
12-20-2024	LDS	Review final versions of Order, Motion & Declaration to be finalized and filed.	0.80	595.00	476.00
12-20-2024	LDS	Draft update re: Northern District of Illinois per court order.	1.20	595.00	714.00
12-20-2024	LDS	Review Opposition brief to Clover Management motion to set aside PI, consider response, and draft related email; confer with K. Galvin and L. Jones re: same.	0.80	595.00	476.00
12-20-2024	LDS	Participate in a call with counsel for Monevo and A. Wall; confer with A. Wall re: same.	0.50	595.00	297.50
12-20-2024	LDS	Confer with L. Jones and K. Galvin re: TCIG asset tracing project.	0.50	595.00	297.50
12-20-2024	KRG	Review defendants' opposition re: Clover management and cross-motion re: asset management.	0.60	195.00	117.00
12-20-2024	KRG	Correspond with S. Chiang re: ownership structure of TCIG.	0.20	195.00	39.00
12-20-2024	KRG	Confer with L. Jones and L. Smith re: TCIG asset tracing project.	0.50	195.00	97.50
12-20-2024	KRG	Confer with L. Jones re: COBRA invoicing process, send follow-up email re: same.	0.30	195.00	58.50
12-21-2024	LDS	Consider potential new Receivership Defendants in context of recent motion to set aside PI.	1.00	595.00	595.00

Date	Professional	Description	Hours	Rate	Amount
12-21-2024	LDS	Continue to draft update to North District of Illinois as required by Court order.	1.70	595.00	1,011.50
12-21-2024	LDS	Review recent Order re: Motion for PI re: Fidelis and Blust OSC and send related email re: next steps and status of Fidelis's motion to challenge being named Receivership Defendant.	0.40	595.00	238.00
12-21-2024	LDS	Review communication to consumers and send related email to counsel for Global re: same.	0.40	595.00	238.00
12-22-2024	LDS	Send variety of emails re: sending of consumer notice and related questions from Global and RAM.	0.30	595.00	178.50
12-23-2024	LDS	Investigate matters re: potential new Receivership Defendants and send related emails.	0.50	595.00	297.50
12-23-2024	ADW	Review and revise Status Report required by Northern District of Illinois; review docket in CFPB Action for important docket items to include; email to L. Smith and T. McNamara with comments.	0.40	495.00	198.00
12-23-2024	ADW	Review correspondence with Nevada Financial Institutions Division re: examination of Versara; review relevant statutes and regulations; confer with T. McNamara re: response.	0.50	495.00	247.50
12-24-2024	ADW	Call with D. Burdette, T. McNamara, and L. Jones re: 2024 ESOP valuation.	0.10	495.00	49.50
12-24-2024	LDS	Call with Plaintiffs re: Defendants' cross-motion for capital calls; general discussion about status.	0.70	595.00	416.50
12-26-2024	ADW	Review legal notices from Vcorp re: Atlas clients; email to J. O'Donnell for processing.	0.50	495.00	247.50
12-26-2024	ADW	Review and revise Receiver's Third Status Report for Northern District of Illinois; finalize main document and exhibit for filing, and file via PACER.	0.90	495.00	445.50
12-26-2024	LDS	Review and finalize Status Report for N. D. Ill. and send related email internally.	0.30	595.00	178.50
12-30-2024	LDS	Review draft notice re: RAM and send final edits to T. McNamara and Strat personnel re: same.	0.30	595.00	178.50
12-31-2024	LDS	Review materials produced by Freed Maxick and confer with T. McNamara re: same.	0.30	595.00	178.50
12-31-2024	LDS	Review email to consumer and confer with Receiver and Strat personnel re: beginning of batch emails to consumers of same.	0.20	595.00	119.00

Total 195.50 **85,532.50**

Time Summary

Professional	Hours	Rate	Amount
Alexander D. Wall	55.90	495.00	27,670.50
Keegan Galvin	63.00	195.00	12,285.00
Logan D. Smith	76.60	595.00	45,577.00
	Total	195.50	85,532.50

Expenses

Date	Description	Amount
12-31-2024	Online research: PACER	88.80
12-31-2024	Online research: Westlaw	262.84
	Total Expenses	351.64
	Total for this Invoice	85,884.14



January 31, 2025

Invoice Period: 01-01-2025 - 01-31-2025

RE: 2158.02 MS

StratFS Receivership

Time Details

Date	Professional	Description	Hours	Rate	Amount
01-02-2025	ADW	Review consumer complaint from Utah Division of Consumer Protection re: Versara Lending; research Utah law re: debt management services companies; draft and send email to Utah Division of Consumer Protection advising them of stay of actions against Versara and requesting acknowledgment.	0.60	495.00	297.00
01-06-2025	ADW	Review collection notice to Atlas client served on Vcorp; forward to J. O'Donnell for processing.	0.10	495.00	49.50
01-06-2025	LDS	Confer with CFPB re: update.	0.30	595.00	178.50
01-06-2025	LDS	Evaluate Ice Legal matter and email opposing counsel re: follow-up.	0.30	595.00	178.50
01-06-2025	KRG	Review financials provided by Freed Maxick re: Blaise, Duke, and Twist.	0.20	195.00	39.00
01-06-2025	KRG	Review Freed Maxick's correspondence with R. Sasson re: 2023 financials to compare to files received by L. Jones.	0.10	195.00	19.50
01-07-2025	KRG	Confer briefly with L. Jones re: accessing and editing shared drive with S. Chiang and uploading documents provided for Duke, Blaise, and Twist from Freed Maxick re: asset tracing.	0.20	195.00	39.00
01-07-2025	KRG	Attend meeting with attorney team re: evidentiary hearing on 1/23.	0.40	195.00	78.00
01-07-2025	KRG	Correspond with L. Jones re: Affordable Care Act filing for Strategic Client Services.	0.20	195.00	39.00
01-07-2025	KRG	Confer with A. Wall, T. McNamara, and L. Smith re: tasks for upcoming Fidelis hearing.	0.50	195.00	97.50
01-07-2025	KRG	Review M. Hinds' .pst in search of instances where J. Blust makes decisions regarding a Fidelis client, confer with A. Wall re: same, send findings	1.10	195.00	214.50

Date	Professional	Description	Hours	Rate	Amount
		to attorney team.			
01-07-2025	LDS	Respond to counsel for Ice Legal and prepare for meeting with counsel; confer with A. Wall re: same.	0.60	595.00	357.00
01-07-2025	LDS	Participate in meeting re: PI hearing later in January and submission re: same.	0.40	595.00	238.00
01-07-2025	LDS	Confer with counsel for CFPB re: update.	0.60	595.00	357.00
01-07-2025	LDS	Review evidence and begin to prepare submission re: evidentiary hearing in January.	2.50	595.00	1,487.50
01-07-2025	ADW	Review email from A. Lundergan re: upcoming call and topics for discussion; review Ice Legal retainer agreement for dispute resolution provisions; email to L. Smith re: dispute resolution and arbitration provision in agreement; confer with L. Smith re: same.	0.60	495.00	297.00
01-07-2025	ADW	Confer with L. Smith re: status of settlement talks with Monevo and next steps.	0.20	495.00	99.00
01-07-2025	ADW	Draft agenda for meeting of Receiver's team re: pending StratFS matters and third-party claims, including review of recent filings and upcoming court dates.	0.20	495.00	99.00
01-07-2025	ADW	Meet with Receiver's team to plan for evidentiary hearing on 1/23.	0.40	495.00	198.00
01-07-2025	ADW	Review Salesforce client records for information re: certain Fidelis/Lit Def clients, in preparation for 1/23 evidentiary hearing; confer with K. Galvin re: same; download and preserve key documents.	0.50	495.00	247.50
01-07-2025	LDS	Confer with A. Wall re: status of settlement talks with Monevo and next steps.	0.20	595.00	119.00
01-07-2025	ADW	Confer with T. McNamara, K. Galvin, and L. Smith re: tasks for upcoming Fidelis hearing.	0.50	495.00	247.50
01-08-2025	ADW	Send text message to K. Rosenberg re: setting up call to discuss upcoming evidentiary hearing.	0.10	495.00	49.50
01-08-2025	ADW	Review and analyze key filings and evidence re: J. Blust and Lit Def contempt, and Fidelis' relationship with Blust; draft memorandum summarizing key documents and exhibits in preparation for evidentiary hearing on 1/23.	2.30	495.00	1,138.50
01-08-2025	ADW	Draft letter motion requesting further extension of time to respond to Monevo's motion to dismiss; email to I. Rainey for review and comment; file via PACER.	0.60	495.00	297.00
01-08-2025	ADW	Confer with K. Galvin multiple times re: identifying	0.50	495.00	247.50

Date	Professional	Description	Hours	Rate	Amount
		relevant evidence and planning for evidentiary hearing on 1/23.			
01-08-2025	ADW	Call with K. Rosenberg re: upcoming evidentiary hearing on 1/23.	0.30	495.00	148.50
01-08-2025	ADW	Meet with Receiver and L. Smith to plan and prepare for upcoming evidentiary hearing on 1/23.	0.50	495.00	247.50
01-08-2025	ADW	Email to V. Buchko of CFPB re: discussion with K. Rosenberg and setting up time to speak.	0.10	495.00	49.50
01-08-2025	LDS	Prepare for evidentiary hearing and begin to draft response, reviewing related legal briefing relating to Fidelis parties and Blust.	3.30	595.00	1,963.50
01-08-2025	LDS	Confer with K. Rosenberg, witness for evidentiary hearing.	0.30	595.00	178.50
01-08-2025	LDS	Meet with Receiver and A. Wall re: submission in advance of hearing.	0.50	595.00	297.50
01-08-2025	LDS	Confer with potential legal malpractice expert and review related materials.	0.70	595.00	416.50
01-08-2025	LDS	Consider potential settlement with Monevo.	0.30	595.00	178.50
01-08-2025	LDS	Draft and send email to counsel for payment processors re: court order re: closure of accounts.	0.50	595.00	297.50
01-08-2025	LDS	Confer with J. O'Donnell re: evidentiary hearing.	0.40	595.00	238.00
01-08-2025	LDS	Confer with C. Ball re: invoicing protocols and Monevo.	0.30	595.00	178.50
01-08-2025	LDS	Draft responsive email to counsel in OSC and send to Receiver for review.	0.40	595.00	238.00
01-08-2025	KRG	Create collection and review set in Microsoft eDiscovery re: Fidelis and Blust correspondence.	0.20	195.00	39.00
01-08-2025	KRG	Review M. Hinds .pst and previously culled documents re: Fidelis for potential new exhibits for evidentiary hearing, send same to A. Wall and L. Smith for further review.	1.70	195.00	331.50
01-08-2025	KRG	Review declarations of Hinds, Christo, and Blust re: Fidelis OSC and confer briefly with A. Wall re: same.	1.60	195.00	312.00
01-09-2025	KRG	Review C. Christo related correspondence in Microsoft eDiscovery re: \$750k "technology" payment.	0.60	195.00	117.00
01-09-2025	KRG	Review M. Hinds .pst for Lit Def invoices, compare same to Fidelis invoices, correspond with L. Smith	0.30	195.00	58.50

Date	Professional	Description	Hours	Rate	Amount
		and A. Wall re: same.			
01-09-2025	KRG	Review past pleadings re: Fidelis to identify false and misleading portions of declarations, list same in working document to be shared with attorneys.	1.80	195.00	351.00
01-09-2025	KRG	Attend call with CFPB and receiver's attorney team re: January 23 hearing logistics re: contempt, OSC, and PI.	0.50	195.00	97.50
01-09-2025	KRG	Confer with A. Wall and T. McNamara re: reviewing C. Christo hot docs from Fidelis confidential production to prepare for hearing.	0.20	195.00	39.00
01-09-2025	KRG	Review C. Christo hot docs re: Fidelis production, draft brief report re: same, correspond with L. Smith and A. Wall re: same.	1.50	195.00	292.50
01-09-2025	LDS	Continue to draft brief in advance of January 23-24 evidentiary hearing and review related documents.	2.70	595.00	1,606.50
01-09-2025	LDS	Review edited response email to counsel in OSC and send comments to Receiver.	0.30	595.00	178.50
01-09-2025	LDS	Confer with Receiver and counsel for CFPB re: hearing brief and logistics of upcoming hearing.	0.50	595.00	297.50
01-09-2025	ADW	Call with A. Lundergan, counsel for Ice Legal, and L. Smith re: discussing tolling agreement, claims and defenses, return of client file, and related issues; confer with L. Smith post-call re: settlement and litigation strategy.	0.80	495.00	396.00
01-09-2025	ADW	Videoconference with V. Buchko and N. Cabanez of CFPB, Receiver, L. Smith, and K. Galvin re: planning for evidentiary hearing on 1/23.	0.50	495.00	247.50
01-09-2025	ADW	Continue reviewing filings and evidence re: relationship between J. Blust, Lit Def Strategies, and Fidelis in preparation for evidentiary hearing.	1.30	495.00	643.50
01-09-2025	ADW	Revise and finalize letter motion requesting extension of time to respond to Monevo's motion to dismiss; file via PACER.	0.30	495.00	148.50
01-09-2025	LDS	Participate in a call with A. Lundergan, counsel for Ice Legal, and A. Wall re: settlement discussions and client file; follow-up with A. Wall.	0.80	595.00	476.00
01-10-2025	LDS	Discuss former employee role internally and agree to reach out to his counsel with questions about \$750k contract.	0.40	595.00	238.00
01-10-2025	ADW	Videoconference with counsel for CFPB and L. Smith re: logistics for evidentiary hearing on 1/23.	0.80	495.00	396.00

Date	Professional	Description	Hours	Rate	Amount
01-10-2025	LDS	Confer with CFPB and Receiver re: logistics of hearing.	0.80	595.00	476.00
01-10-2025	LDS	Confer with Receiver and J. Thoman re: hearing.	0.40	595.00	238.00
01-10-2025	LDS	Confer with CFPB's counsel as follow-up re: hearing.	0.50	595.00	297.50
01-10-2025	LDS	Continue to prepare for evidentiary hearing by drafting comprehensive pre-hearing brief and circulate same.	3.80	595.00	2,261.00
01-10-2025	LDS	Confer with StratFS former head of IT re: investigation.	0.40	595.00	238.00
01-10-2025	LDS	Review correspondence with counsel for Cameron Christo and Fidelis.	0.30	595.00	178.50
01-10-2025	KRG	Confer with L. Jones re: uploading additional accounting documents to OneDrive for S. Chiang and upcoming call with N. Shi re: Affordable Care Act forms for StratFS employees in 2025.	0.20	195.00	39.00
01-10-2025	KRG	Review Affordable Care Act 1095 form in preparation of call with N. Shi (ADP).	0.10	195.00	19.50
01-10-2025	KRG	Review Blust .pst for correspondence with H. Zayed on her Fidelis email, review M. Hinds .pst re: same.	1.40	195.00	273.00
01-10-2025	KRG	Confer with L. Jones re: Affordable Care Act compliance tasks in ADP for StratFS employees.	0.20	195.00	39.00
01-10-2025	KRG	Confer briefly with S. Chiang re: call to discuss asset tracing project.	0.10	195.00	19.50
01-11-2025	LDS	Send several emails to Receiver and counsel for former employee re: outreach.	0.50	595.00	297.50
01-12-2025	LDS	Send additional follow-up emails to Receiver and counsel for former employee.	0.30	595.00	178.50
01-13-2025	LDS	Confer with counsel for Monevo and A. Wall and review related materials.	0.40	595.00	238.00
01-13-2025	LDS	Confer with StratFS personnel re: investigation of law firm "technology spend".	0.40	595.00	238.00
01-13-2025	LDS	Confer with former employee re: investigation of law firm expenditures and review related documents.	0.90	595.00	535.50
01-13-2025	LDS	Draft and send email to Receiver re: next steps in mediation/arbitration with third-party.	0.30	595.00	178.50
01-13-2025	LDS	Confer with counsel for CFPB re: pre-hearing	0.50	595.00	297.50

Date	Professional	Description	Hours	Rate	Amount
		briefing and logistics of hearing.			
01-13-2025	LDS	Continue to investigate C. Christo and Fidelis's involvement in law firm technology and relationship with Blust; review related materials.	1.40	595.00	833.00
01-13-2025	LDS	Continue to draft pre-hearing brief and consider contents and potential exhibits re: same.	1.50	595.00	892.50
01-13-2025	ADW	Call with K. Rosenberg re: transmitting documents to CFPB and related issues; email to V. Buchko with link to documents from K. Rosenberg.	0.40	495.00	198.00
01-13-2025	ADW	Perform legal research re: burden of proof and evidentiary requirements for upcoming evidentiary hearing on 1/23.	2.30	495.00	1,138.50
01-13-2025	ADW	Call with I. Rainey, counsel for Monevo, and L. Smith re: settlement; confer with L. Smith re: settlement demand.	0.40	495.00	198.00
01-13-2025	ADW	Call with V. Buchko re: documents from K. Rosenberg.	0.10	495.00	49.50
01-13-2025	ADW	Meet with Receiver, L. Smith, and K. Galvin re: upcoming evidentiary hearing on 1/23, including discussion of exhibits, structure and substance of hearing brief, and planning for witness examinations.	1.00	495.00	495.00
01-13-2025	KRG	Review employees in ADP to comply with Affordable Care Act compliance.	1.60	195.00	312.00
01-13-2025	KRG	Review and send out COBRA letters for COBRA-eligible employees.	0.20	195.00	39.00
01-13-2025	KRG	Briefly confer with L. Jones re: Affordable Care Act compliance tasks in ADP.	0.10	195.00	19.50
01-13-2025	KRG	Call with N. Shi (ADP benefits representation) re: Affordable Care Act compliance tasks in ADP.	0.30	195.00	58.50
01-13-2025	KRG	Meet with Receiver, L. Smith, and A. Wall re: exhibit list and upcoming hearing re: Fidelis.	1.00	195.00	195.00
01-13-2025	KRG	Review notes from meeting re: exhibit list, draft exhibit list in for attorneys review.	1.20	195.00	234.00
01-13-2025	LDS	Meet with Receiver, A. Wall, and K. Galvin re: 1/23 upcoming evidentiary hearing.	1.00	595.00	595.00
01-14-2025	ADW	Draft section summarizing factual and procedural background for hearing brief in advance of 1/23 evidentiary hearing; email L. Smith for review and comment.	2.50	495.00	1,237.50

Date	Professional	Description	Hours	Rate	Amount
01-14-2025	KRG	Confer briefly with L. Jones re: Affordable Care Act ADP compliance tasks.	0.20	195.00	39.00
01-14-2025	KRG	Create review set in Microsoft eDiscovery platform re: Blust and Sasson exclusive correspondence.	0.20	195.00	39.00
01-14-2025	KRG	Continue to identify and organize potential exhibits for evidentiary hearing re: Fidelis.	1.20	195.00	234.00
01-14-2025	KRG	Review Blust and Sasson correspondence re: \$750k payment for "technology spend" and upcoming Fidelis hearing, identifying and preserving relevant documents along the way.	2.70	195.00	526.50
01-14-2025	KRG	Draft chronology of relevant facts related to \$750k payment, send chronology and relevant documents re: same to A. Wall and L. Smith.	0.70	195.00	136.50
01-14-2025	ADW	Review and analyze pleadings and declarations re: Receiver's motion for OSC re: J. Blust and Lit Def and Fidelis's motion challenging Receiver's determination.	2.20	495.00	1,089.00
01-14-2025	ADW	Review email from B. Reiss re: Intervenor Law Firms and Fidelis "technology spend"; review Fidelis documents re: timing of StratFS payments of "technology spend" to Fidelis.	0.30	495.00	148.50
01-14-2025	LDS	Confer with counsel for CFPB re: hearing brief and logistics of hearing.	0.40	595.00	238.00
01-14-2025	LDS	Continue to draft pre-hearing brief with focus on legal arguments; participate in internal discussion re: same.	3.20	595.00	1,904.00
01-14-2025	LDS	Follow up re: \$750,000 payment for "law firm technology" and confer internally re: same; review materials assembled by K. Galvin.	0.80	595.00	476.00
01-15-2025	LDS	Continue to prepare pre-hearing brief due 1/16 and revise drafts throughout day; discuss internally throughout day [worked 9.5 hours, only billed 7 hours].	7.00	595.00	4,165.00
01-15-2025	LDS	Engage in follow-up conversation with former employee re: investigation of background facts on Fidelis.	0.50	595.00	297.50
01-15-2025	ADW	Review collection notices re: Atlas clients, served on Vcorp; forward to J. O'Donnell for processing.	0.20	495.00	99.00
01-15-2025	ADW	Confer with K. Galvin re: drafting of exhibit list for 1/23 evidentiary hearing.	0.20	495.00	99.00
01-15-2025	ADW	Review and analyze Protective Order in connection with use of documents produced by Fidelis.	0.30	495.00	148.50

Date	Professional	Description	Hours	Rate	Amount
01-15-2025	ADW	Continue drafting factual and procedural background section of hearing brief for 1/23 evidentiary hearing.	3.80	495.00	1,881.00
01-15-2025	ADW	Review, re-structure, and revise argument section of hearing brief; continue drafting and revising entire hearing brief through multiple rounds of revision; confer internally numerous times re: hearing brief.	4.00	495.00	1,980.00
01-15-2025	KRG	Correspond briefly with L. Jones re: Affordable Care Act 1095 forms in ADP.	0.20	195.00	39.00
01-15-2025	KRG	Confer multiple times with L. Smith and A. Wall re: \$750k payment and conversations with third-party individuals re: same.	0.30	195.00	58.50
01-15-2025	KRG	Identify potential exhibits for Fidelis hearing brief from docket.	1.60	195.00	312.00
01-15-2025	KRG	Review, identify, and circulate potential exhibits for hearing brief that have not previously been lodged with the court.	1.70	195.00	331.50
01-15-2025	KRG	Review Hinds correspondence in .pst files for Blust giving bonuses to Fidelis employees.	0.70	195.00	136.50
01-16-2025	KRG	Draft and circulate exhibit list summary to attorneys for review.	0.80	195.00	156.00
01-16-2025	KRG	Correspond with S. Chiang re: call for update on asset tracing project.	0.20	195.00	39.00
01-16-2025	KRG	Review various drafts of hearing brief for factual accuracy, correspond with A. Wall and L. Smith re: same.	1.20	195.00	234.00
01-16-2025	KRG	Print exhibits not previously lodged with court and organize them for attorneys to review and decide whether they will be incorporated; confer with A. Wall re: same.	1.10	195.00	214.50
01-16-2025	KRG	Review Microsoft eDiscovery for Rufty arbitration complaints, confer briefly with A. Wall re: same.	0.70	195.00	136.50
01-16-2025	KRG	Draft final exhibit list for hearing brief and send to A. Wall, review same for accuracy multiple times.	2.20	195.00	429.00
01-16-2025	KRG	Begin identifying exhibits submitted in Personius' exhibit list re: Blust, correspond briefly with L. Smith re: same.	0.50	195.00	97.50
01-16-2025	KRG	Assemble final exhibits to be attached to A. Wall declaration ISO hearing brief, correspond with A. Wall re: same.	0.70	195.00	136.50

Date	Professional	Description	Hours	Rate	Amount
01-16-2025	ADW	Call with Utah Consumer Protection Division re: status of case and relevant information for affected consumers.	0.10	495.00	49.50
01-16-2025	ADW	Research D. Ruffy's lawsuits against Strategic, Blust, and Lit Def for discussion in Hearing Brief.	0.50	495.00	247.50
01-16-2025	ADW	Review and analyze Fidelis, C. Christo, and Bush Lake Trust's Hearing Brief; review J. Blust and Lit Def's witness list and exhibit list.	0.70	495.00	346.50
01-16-2025	ADW	Review and analyze Protective Order and requirements for use of documents produced by Fidelis; send email to Receiver and L. Smith summarizing relevant provisions of the Protective Order.	0.40	495.00	198.00
01-16-2025	ADW	Draft Declaration of Alexander D. Wall re: Receiver's Hearing Brief.	0.70	495.00	346.50
01-16-2025	ADW	Confer with L. Smith re: confidentiality designations.	0.40	495.00	198.00
01-16-2025	ADW	Review and revise proposed Exhibit List of Receiver for 1/23 evidentiary hearing; re-format Exhibit List; review additional exhibits and add to Exhibit List; email to Receiver for review.	1.70	495.00	841.50
01-16-2025	ADW	Call with counsel for CFPB re: Fidelis's confidentiality designations.	0.10	495.00	49.50
01-16-2025	ADW	Prepare PDF copies of all exhibits for Hearing Brief; assemble and finalize all exhibits and declarations for filing.	1.00	495.00	495.00
01-16-2025	ADW	Finalize Receiver's Hearing Brief, Witness List, and Exhibit List; finalize Declaration of Alexander D. Wall; file all documents via PACER.	0.50	495.00	247.50
01-16-2025	LDS	Finalize hearing brief and review multiple versions of same throughout day, confer throughout day re: same (worked 11.5 hours, only billed 7.0 hours).	7.00	595.00	4,165.00
01-16-2025	LDS	Confer with former StratFS personnel B. Reiss re: preparation of declaration in support of pre-hearing brief; follow up throughout day re: same to obtain copy of declaration.	0.80	595.00	476.00
01-16-2025	LDS	Confer with CFPB counsel re: hearing brief and confidentiality designations of Fidelis; confer with A. Wall re: same.	0.40	595.00	238.00
01-16-2025	LDS	Conduct legal research re: violations of contempt.	0.80	595.00	476.00
01-17-2025	LDS	Continue to prepare for hearing; review pre-hearing briefs submitted by other parties.	1.80	595.00	1,071.00

Date	Professional	Description	Hours	Rate	Amount
01-17-2025	LDS	Confer with opposing counsel for third-party re: mediation and provide internal update following call.	0.40	595.00	238.00
01-17-2025	LDS	Confer internally and with co-counsel re: hearing next week and general update.	0.70	595.00	416.50
01-17-2025	LDS	Review emails re: Monevo and confer with A. Wall re: same.	0.30	595.00	178.50
01-17-2025	LDS	Confer with CFPB re: logistics for upcoming hearing.	0.40	595.00	238.00
01-17-2025	ADW	Call with V. Buchko re: K. Rosenberg's testimony.	0.10	495.00	49.50
01-17-2025	ADW	Review documentation re: damages and calculate prejudgment interest amount; draft settlement email to I. Rainey (Monevo) outlining Receiver's settlement position and offer.	1.10	495.00	544.50
01-17-2025	ADW	Email to I. Rainey (Monevo) setting up call to discuss settlement.	0.10	495.00	49.50
01-17-2025	ADW	Call with CFPB's counsel re: coordinating for 1/23 evidentiary hearing.	0.40	495.00	198.00
01-17-2025	ADW	Call with I. Rainey, counsel for Monevo, re: settlement.	0.40	495.00	198.00
01-17-2025	ADW	Email to L. Jones re: Wisconsin tax lien issue.	0.10	495.00	49.50
01-17-2025	ADW	Confer with K. Galvin re: review of Fidelis emails concerning "vetting" software.	0.20	495.00	99.00
01-17-2025	KRG	Attend call with L. Jones and S. Chiang re: StratFS asset tracing.	1.20	195.00	234.00
01-17-2025	KRG	Continue to review Fidelis confidential correspondence to identify exhibits designated in Personius's exhibit list.	2.50	195.00	487.50
01-17-2025	KRG	Finalize exhibits to be transmitted to Thoman's office, renaming and bates stamping re: same.	2.20	195.00	429.00
01-18-2025	KRG	Continue to review Fidelis confidential correspondence to identify exhibits designated in Personius's exhibit list, create exhibit binder for Receiver re: same.	4.80	195.00	936.00
01-18-2025	ADW	Upload Receiver's hearing exhibits to shared folder; email document link to J. Thoman's office with instructions for printing.	0.40	495.00	198.00
01-18-2025	ADW	Research case law re: use of a stipulated list of questions to invoke Fifth Amendment and inference; draft and send email to Receiver and L.	1.20	495.00	594.00

Date	Professional	Description	Hours	Rate	Amount
		Smith summarizing research.			
01-18-2025	ADW	Review relevant documents and party declarations; draft hearing examination questions for J. Blust.	5.10	495.00	2,524.50
01-20-2025	LDS	Prepare for hearing with focus on examination of K. Rosenberg and cross-examination of M. Hinds Gallagher and prepare examination re: same.	1.50	595.00	892.50
01-20-2025	LDS	Continue to prepare for hearing and review issues re: exhibits.	2.20	595.00	1,309.00
01-20-2025	KRG	Correspond with Receiver re: Christo exhibits and case strategy.	1.00	195.00	195.00
01-21-2025	KRG	Review payroll information for Lit Def employees provided to Receiver by L. Alvarez, confer with A. Wall re: same, draft and circulate re: same.	0.90	195.00	175.50
01-21-2025	KRG	Review documents in Microsoft eDiscovery for a general ledger for TCIG LLC re: S. Chiang's asset tracing project.	0.50	195.00	97.50
01-21-2025	KRG	Create new review set in Microsoft eDiscovery platform re: M. Krueger and S. Quach re: QuickBooks reports.	0.30	195.00	58.50
01-21-2025	KRG	Gather exhibits identified in exhibit list from Fidelis counsel (Hoover and Durland), create binder for T. McNamara re: Fidelis exhibits.	4.30	195.00	838.50
01-21-2025	LDS	Prepare for hearing on Thursday and Friday (January 23rd and 24th), including preparing direct written questions for C. Christo, J. Blust, and M. Hinds (Gallagher); confer with A. Wall re: same.	3.60	595.00	2,142.00
01-21-2025	LDS	Prepare response to defendants' letters re: evidentiary hearing, addressing issues re: intention not to appear and review multiple versions with edits by T. McNamara.	3.20	595.00	1,904.00
01-21-2025	LDS	Prepare direct examination questions of K. Rosenberg and review related exhibits.	0.80	595.00	476.00
01-21-2025	ADW	Review all declarations of C. Christo and related documents; draft examination questions for C. Christo re: evidentiary hearing on 1/23.	3.10	495.00	1,534.50
01-21-2025	ADW	Review and heavily revise and restructure examination questions to J. Blust re: evidentiary hearing on 1/23.	1.70	495.00	841.50
01-21-2025	ADW	Review and revise Receiver's letter filing in response to Blust Defendant and Fidelis Defendant letter filings of 1/21.	1.00	495.00	495.00

Date	Professional	Description	Hours	Rate	Amount
01-21-2025	ADW	Proofread and finalize Receiver's letter filing in response to Blust Defendant and Fidelis Defendant letter filings of 1/21; prepare letter and exhibit for filing; file via PACER.	0.50	495.00	247.50
01-22-2025	ADW	Review and analyze M. Hinds Gallagher's declaration re: reconsideration of order to appear at 1/23 hearing.	0.40	495.00	198.00
01-22-2025	ADW	Review letter filing by Fidelis re: 1/23 evidentiary hearing.	0.10	495.00	49.50
01-22-2025	ADW	Review Court's text order re: presence of witnesses at hearing on 1/23 and Fidelis's requests to quash subpoenas.	0.30	495.00	148.50
01-22-2025	ADW	Draft cross-examination of M. Hinds Gallagher, with document references; email to L. Smith for review.	1.80	495.00	891.00
01-22-2025	ADW	Review and revise Receiver's written questions to J. Blust.	0.90	495.00	445.50
01-22-2025	ADW	Confer internally re: reimbursing K. Rosenberg for lodging and meals, and related logistics.	0.20	495.00	99.00
01-22-2025	LDS	Confer with counsel for CFPB re: presentation of witnesses and upcoming hearing and follow-up with Receiver re: same (8.0 hours not billed for travel to Buffalo from San Diego).	0.40	595.00	238.00
01-22-2025	LDS	Prepare written questions for cross-examination of C. Christo and circulate same.	1.40	595.00	833.00
01-22-2025	LDS	Prepare and revise written questions for cross-examination for J. Blust and circulate same.	1.20	595.00	714.00
01-22-2025	LDS	Prepare cross-examination of M. Hinds Gallagher.	1.50	595.00	892.50
01-22-2025	LDS	Prepare direct examination of K. Rosenberg.	1.20	595.00	714.00
01-22-2025	LDS	Review court order re: testimony and in-person requirements and consider implications of same for hearing.	0.30	595.00	178.50
01-22-2025	KRG	Call Judge Roemer's deputy clerk to discuss court room technology logistics.	0.10	195.00	19.50
01-22-2025	KRG	Correct Affordable Care Act eligible employees in ADP for L. Jones, confer briefly with L. Jones re: same.	2.70	195.00	526.50
01-22-2025	KRG	Correspond with Buffalo courthouse IT department re: exhibit sharing, relay correspondence to Receiver re: same.	0.50	195.00	97.50

Date	Professional	Description	Hours	Rate	Amount
01-22-2025	KRG	Confer briefly with L. Jones re: QuickBooks files for S. Chiang re: StratFS asset tracing project.	0.20	195.00	39.00
01-23-2025	KRG	Continue to review Microsoft eDiscovery platform re: QuickBooks reports, identify relevant documents re: same, correspond with S. Chiang re: same.	1.00	195.00	195.00
01-23-2025	ADW	Confer with L. Jones re: status of Wisconsin tax lien re: Monevo negotiations.	0.20	495.00	99.00
01-23-2025	ADW	Email to I. Rainey re: release of Wisconsin tax lien and status of Monevo's settlement offer.	0.20	495.00	99.00
01-23-2025	ADW	Review Receiver's exhibits, and provide copies to Court and all parties; create shared download folder for Receiver's hearing exhibits and circulate to Court and all parties.	0.70	495.00	346.50
01-23-2025	ADW	Review and revise Notice to Consumers re: closure of dedicated accounts; confer internally re: same.	0.30	495.00	148.50
01-23-2025	ADW	Review and analyze Clover's motion for relief from stay re: dilution of equity; review and analyze Defendants' response and cross-motion to compel Receiver.	1.00	495.00	495.00
01-23-2025	LDS	Prepare for and attend first day of hearing re: OSC Contempt Motion (Blust) and Preliminary Injunction for Fidelis Parties (Fidelis, C. Christo, and Bush Lake Trust), taking lead on examination of K. Rosenberg and M. Hinds; confer with Receiver and co-counsel throughout the day.	5.20	595.00	3,094.00
01-23-2025	LDS	Review cross-motion re: Duke, Twist, and Blaise Investments and consider potential responses thereto.	1.20	595.00	714.00
01-24-2025	LDS	Consider arguments re: Clover and send request to Counsel for Individual Defendants re: cross-motion re: Duke, Twist, and Blaise Investments; confer with counsel for CFPB re: same.	0.30	595.00	178.50
01-24-2025	LDS	Prepare for and attend second day of hearing; and follow-up with Receiver and other counsel re: same (6.5 hours not billed for travel from Buffalo to San Diego).	2.80	595.00	1,666.00
01-24-2025	LDS	Consider follow-up issues and begin to prepare motion for OSC re: contempt for Fidelis and C. Christo.	1.20	595.00	714.00
01-24-2025	ADW	Call with Strategic consumer re: status of case, recent orders re: closing of dedicated accounts, and related issues.	0.30	495.00	148.50
01-24-2025	KRG	Continue to search Microsoft eDiscovery for	1.30	195.00	253.50

Date	Professional	Description	Hours	Rate	Amount
		QuickBooks files for S. Chiang re: asset tracing project.			
01-26-2025	ADW	Begin drafting Motion for OSC re: Contempt re: Fidelis and Christo.	1.00	495.00	495.00
01-27-2025	ADW	Continue to draft Motion for OSC re: Contempt re: Fidelis and Christo.	6.20	495.00	3,069.00
01-27-2025	KRG	Monitor info@regulatoryresolutions.com for employee emails, respond to emails re: same.	0.30	195.00	58.50
01-27-2025	KRG	Upload tax and accounting files for S. Chiang to review in Microsoft OneDrive, correspond with S. Chiang re: same.	0.30	195.00	58.50
01-27-2025	KRG	Correpond with L. Smith re: upcoming reply to cross-motion and related asset tracing.	0.10	195.00	19.50
01-27-2025	KRG	Review eDelivery terms and conditions from T. Wisner re: access to data listing Highmark insurance discrepancies, correspond with Wisner re: same.	0.20	195.00	39.00
01-27-2025	KRG	Review M. Krueger and S. Quach correspondence and files in Microsoft eDiscovery re: QuickBooks reports, identify and preserve relevant documents, correspond with S. Chiang re: same.	1.20	195.00	234.00
01-27-2025	LDS	Consider next steps in third-party litigation with Ice Legal and identify potential mediators; send email to opposing counsel.	0.60	595.00	357.00
01-27-2025	LDS	Draft motion for contempt following hearing and focus on Fidelis and C. Christo allegations; review and revise draft from A. Wall.	1.50	595.00	892.50
01-28-2025	LDS	Continue to draft Motion for OSC re: contempt against Fidelis and Cameron Christo and revise throughout day.	1.80	595.00	1,071.00
01-28-2025	LDS	Confer with K. Galvin re: S. Chiang asset tracing project.	0.50	595.00	297.50
01-28-2025	KRG	Review Defendants' opposition to Clover motion and cross-motion for Receiver to pay capital calls and expenses; confer with A. Wall and L. Smith re: same, begin draft summary re: same.	1.10	195.00	214.50
01-28-2025	KRG	Confer with L. Smith re: asset tracing project, correspond with S. Chiang re: same.	0.50	195.00	97.50
01-28-2025	ADW	Continue drafting Motion for OSC re: Contempt re: Fidelis and Christo; email to L. Smith for review and revision.	4.20	495.00	2,079.00
01-28-2025	ADW	Correspond with J. Thoman's office re: status of	0.20	495.00	99.00

Date	Professional	Description	Hours	Rate	Amount
		evidentiary hearing transcripts.			
01-29-2025	ADW	Confer multiple times with K. Galvin re: Clover motion for relief from stay and Individual Defendant's cross-motion to compel Receiver.	0.50	495.00	247.50
01-29-2025	ADW	Review and analyze transcript of January 23-25, 2025 evidentiary hearing; summarize questioning J. Blust and C. Christo and adverse inferences arising from invocation of Fifth Amendment privilege.	4.60	495.00	2,277.00
01-29-2025	KRG	Correspond with StratFS employee re: change needed in coverage, confer with N. Shi (ADP) re: same.	0.20	195.00	39.00
01-29-2025	KRG	Continue to draft summary of Defendant's opposition to clover motion and cross-motion.	0.50	195.00	97.50
01-29-2025	KRG	Attend call with N. Shi (ADP) re: K. Godios removal of defendant as beneficiary in ADP, follow up with K. Godios re: same.	0.20	195.00	39.00
01-29-2025	KRG	Review hearing transcript re: evidentiary hearing re: Fidelis.	0.50	195.00	97.50
01-29-2025	KRG	Review documents in Microsoft eDiscovery platform re: Duke and Fusion Capital relationship.	1.20	195.00	234.00
01-29-2025	KRG	Attend call with T. McNamara, J. Thoman, A. Wall, and L. Smith re: asset tracing project, confer with A. Wall and L. Smith briefly re: same after call.	0.90	195.00	175.50
01-29-2025	LDS	Confer with Receiver and co-counsel re: Clover and assets; review related materials.	0.90	595.00	535.50
01-29-2025	LDS	Draft response in opposition to Individual Defendants' cross-motion and conduct related investigation.	1.20	595.00	714.00
01-30-2025	LDS	Attend call with forensic accountant and K. Galvin re: asset tracing project (partially attended call).	0.50	595.00	297.50
01-30-2025	LDS	Review cross-motion and draft response re: same with focus on asset tracing and potentially naming new Receivership Defendants through cross-motion.	2.20	595.00	1,309.00
01-30-2025	LDS	Participate in call with counsel for CFPB and A. Wall re: Clover motion and Individual cross-motion, and issues relating to Defendants' assets.	1.00	595.00	595.00
01-30-2025	KRG	Search StrategicBX in Microsoft eDiscovery platform for ownership structure, correspond with L. Smith re: same.	0.20	195.00	39.00
01-30-2025	KRG	Prepare mailing of W-2's for StratFS employees.	1.50	195.00	292.50

Date	Professional	Description	Hours	Rate	Amount
01-30-2025	KRG	Attend call with L. Smith, L. Jones, and S. Chiang re: asset tracing project for reply to cross-motion.	2.00	195.00	390.00
01-30-2025	KRG	Upload additional documents found in Microsoft eDiscovery re: StratFS asset tracing to OneDrive in preparation for call with S. Chiang and L. Jones re: asset tracing.	0.40	195.00	78.00
01-30-2025	ADW	Videoconference with counsel for CFPB and L. Smith re: Clover motion and Defendants' cross-motion, and issues relating to Defendants' assets.	1.00	495.00	495.00
01-30-2025	ADW	Finish reviewing and analyzing transcripts of January 23-24, 2025 evidentiary hearing and summarizing adverse inferences re: J. Blust, C. Christo, and M. Hinds Gallagher; review and revise Motion for OSC re: Fidelis and Christo.	3.80	495.00	1,881.00
01-31-2025	ADW	Confer with L. Smith re: ongoing settlement discussions with Monevo and pending motion to dismiss.	0.30	495.00	148.50
01-31-2025	ADW	Finish drafting and revising Motion for OSC re: Fidelis; email to Receiver for review and comment; confer multiple times with L. Smith re: same.	3.80	495.00	1,881.00
01-31-2025	KRG	Confer with L. Smith multiple times re: asset tracing project, review documents in Microsoft eDiscovery platform re: same.	1.20	195.00	234.00
01-31-2025	KRG	Review StratFS preserved document index for accounting documents related to Fusion Capital LLC's funding and spending, search Microsoft eDiscovery platform re: same.	3.50	195.00	682.50
01-31-2025	KRG	Review LLC chart and Microsoft eDiscovery for investment vessels and percentage ownership for Clover funds IV, V, and VI for L. Smith.	0.70	195.00	136.50
01-31-2025	KRG	Review Microsoft eDiscovery results for YCM 120 LLC, investigate potential second yacht re: same, confer with L. Smith and A. Wall re: same.	1.20	195.00	234.00
01-31-2025	KRG	Review S. Duchon NDA for StratFS, confer with A. Wall re: same, draft small analysis and circulate same to Receiver and L. Smith.	0.80	195.00	156.00
01-31-2025	LDS	Confer with A. Wall re: ongoing settlement discussions with Monevo and pending motion to dismiss.	0.30	595.00	178.50
01-31-2025	LDS	Draft and revise Motion re: contempt for Fidelis and C. Christo; confer with A. Wall re: same; review multiple drafts of same.	1.70	595.00	1,011.50
01-31-2025	LDS	Continue to draft Response to cross-motion of Individual Defendants Sasson, Behar, and	3.20	595.00	1,904.00

Date	Professional	Description	Hours	Rate	Amount
		Blumkin and review related materials; conduct related investigation and review related materials; confer with K. Galvin and A. Wall throughout day and prepare cross-motion re: new Receivership Defendants and review tracing analysis.			
Total				256.60	113,797.00

Time Summary

Professional	Hours	Rate	Amount
Alexander D. Wall	82.40	495.00	40,788.00
Keegan Galvin	76.60	195.00	14,937.00
Logan D. Smith	97.60	595.00	58,072.00
Total		256.60	113,797.00

Expenses

Date	Description	Amount
01-22-2025	Out-of-town travel: Taxi to Airport (L. Smith)	50.40
01-22-2025	Out-of-town travel: Uber (L. Smith)	16.22
01-22-2025	Out-of-town travel: Meals (L. Smith)	24.00
01-23-2025	Out-of-town travel: Hyatt (L. Smith)	415.19
01-24-2025	Out-of-town travel: R/T Airfare (L. Smith)	1,106.36
01-24-2025	Out-of-town travel: Uber (L. Smith)	28.20
01-24-2025	Out-of-town travel: Meals (L. Smith)	25.10
01-31-2025	Online research:Westlaw	137.22
Total Expenses		1,802.69

Total for this Invoice 115,599.69